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Commissioner	:	M. Picker
Administrative Law Judge	:	S. Park
ORA Witness	:	Roy Keowen



**REPORT AND RECOMMENDATIONS
ON CALIFORNIA AMERICAN WATER COMPANY'S
BALANCING AND MEMORANDUM ACCOUNTS,
SPECIAL REQUEST #5, SPECIAL REQUEST #8, SPECIAL
REQUEST #11, AND SPECIAL REQUEST #18**

Application 16-07-002

**San Francisco, California
February 13, 2017**

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CHAPTER 1: GENERAL RECOMMENDATION FOR CALAM'S BALANCING AND MEMORANDUM ACCOUNTS

A. Introduction

In A.16-07-002, Cal Am makes requests related to 41 balancing and memorandum (“memo”) accounts. Cal Am supports its requests through the Direct Testimony of Jeffrey Dana.¹ Generally, Cal Am requests recovery or refund of outstanding account balances through year-end 2017.² Cal Am also requests various treatments beyond the current rate case cycle.³

The outstanding account balances for each account are presented in Attachment 1 of Jeffrey Dana’s testimony.⁴ Cal Am presents the outstanding balances as of May 31, 2016, by account. To further clarify Cal Am’s request, ORA presents Cal Am’s stated balance by district in Attachment 1. The combined total of all of Cal Am’s balancing and memo accounts presented in this General Rate Case (“GRC”) is \$213 million. For perspective, the total balancing and memo account balances requested by Cal Am in this GRC is 87% of Cal Am’s proposed company-wide total Test Year 2018 revenue requirement of \$245 million.⁵

This chapter provides ORA’s findings and recommendations on Cal Am’s balancing and memo accounts. ORA’s recommendations do not address any

¹ A.16-07-002 at p.20.

² The Direct Testimony of Jeffrey Dana at p.3.

³ The Direct Testimony of Jeffrey Dana at p.3.

⁴ The Direct Testimony of Jeffrey Dana at p.3.

⁵ The total of all of Cal Am's balancing and memo account presented in Attachment 1 of Jeffrey Dana's Testimony is \$213,079,633. The company-wide proposed Test Year revenue requirement is \$245,443,738. $\$213,079,633/\$245,443,738$ is 86.81%.

specific requests made by Cal Am, but rather relate to issues that are applicable to more than one of Cal Am's balancing and memo accounts. Specific findings and recommendations related to Cal Am's balancing and memo accounts are provided in Chapter 2.

B. Summary of Recommendations

- The Commission should limit Cal Am's request for recovery of account balances to May 31, 2016, unless the account was previously authorized through a specified dated or the balance was approved for recovery outside the current GRC. Cal Am's request to recover balances through December 31, 2017 is unreasonable since that would authorize recovery or refund of amounts that have not been reviewed for reasonableness and prudence.
- The Commission should deny Cal Am's requests for recovery or refund of account balances presented in this GRC proceeding that are approved via other avenues (e.g. Advice Letter or Commission Resolution) to prevent the possibility of double-recovery of outstanding account balances..
- The Commission should exclude from outstanding account balances any amounts that have already been approved for recovery by the Commission in a previous proceeding, advice letter, or resolution.

C. Discussion

1) Cal Am's Request to Recover Balances Through December 31, 2017 is Unreasonable.

Cal Am's general request for recovery or refund of account balances through year-end 2017⁶ is unreasonable and should be denied. Balancing and

⁶ The Direct Testimony of Jeffrey Dana at p.3.

1 memo accounts must be reviewed on a historical basis to ensure the
2 reasonableness and prudence of outstanding account balances. Cal Am's
3 application presents account balances through May 31, 2016.⁷ Therefore, ORA's
4 reasonableness and prudence review addresses balances only through May 31,
5 2016. The Commission should limit recovery of Cal Am's balancing and memo
6 account outstanding balances to May 31, 2016. If Cal Am's request to recover or
7 refund account balances through year-end 2017 is authorized, amounts recorded in
8 the accounts for the period between May 31, 2016 and December 31, 2017 will go
9 un-reviewed. Consequently, it is unreasonable to adopt this request.

10 There are some exceptions to ORA's general recommendation to limit
11 recovery in this GRC to May 31, 2016 account balances. Cal Am stated in
12 testimony that it has several accounts that have separate proceedings concurrent
13 with the GRC.⁸ It is possible that the Commission will grant recovery or refund of
14 outstanding account balances in these separate proceedings for those accounts as
15 of a date subsequent to May 31, 2016. Therefore, the recommendation to limit
16 recovery to outstanding account balances as of May 31, 2016 should only apply to
17 recovery or refund of account balances that are authorized in the current GRC.

18 **2) Beginning Balances Previously Approved for Recovery Should Not**
19 **Be Requested or Approved a Second Time.**

20 Several accounts were identified as having beginning balances that were
21 approved for recovery in the previous GRC. Cal Am included these beginning
22 balances in this GRC since it presents the cumulative balance for each account.⁹

⁷ The Direct Testimony of Jeffrey Dana at p.3.

⁸ See the Direct Testimony of Jeffrey Dana related to the Coastal Water Project Memorandum Account found at p.11, the Monterey Leak Adjust memorandum Account at p.22.

⁹ Cal Am's Response to Data Request RK2-001, Q(1)(a).

1 Cal Am claims it has not yet filed an Advice Letter to transfer previously approved
2 balances.¹⁰ This is inappropriate for the reasons discussed below.

3 In the Settlement Agreement adopted in D.15-04-007, Cal Am agreed to
4 transfer the balances that were approved for recovery in the previous GRC to its
5 Consolidated Expense Balancing Account (CEBA).¹¹ The purpose of Cal Am's
6 CEBA is to consolidate the amortization of Commission approved balancing and
7 memo accounts where appropriate.¹² Another purpose of the CEBA is to address
8 an issue common to all balancing accounts. A balancing account cannot be fully
9 amortized unless the consumption forecast is 100% accurate, because most
10 balancing account amortizations are based on consumption. If the consumption
11 forecast is even slightly off, balancing accounts, at the end of the authorized
12 amortization period, will have remaining balances. The left over balances are
13 commonly referred to as residual balances. Residual balances are a result of an
14 imperfect consumption forecast, but present a problem in that final balancing
15 account balances will never be exactly zero. Therefore, balances can remain on
16 Cal Am's Preliminary Statement for an extended period of time. The CEBA
17 addresses the issue because Cal Am can transfer outstanding balances from
18 various balancing accounts for recovery on an ongoing basis. Approved balancing
19 account balances resulting from the GRC or Advice Letter process are added to
20 the CEBA balance. The CEBA surcharge is then periodically adjusted to recover
21 (or refund) the outstanding balance in the CEBA. As a result, customers only
22 observe a single surcharge on their bill, rather than multiple surcharges from
23 multiple balancing accounts.

¹⁰ Cal Am's Response to ORA Data Request RK2-005.4.

¹¹ The Settlement Agreement adopted in D.15-04-007, p.155.

¹² The Direct Testimony of Jeffrey Dana, at p.3.

1 Another benefit of the CEBA is that it eases the review process for both
2 balancing and memo accounts. Once approved balances are transferred to the
3 CEBA, the account from which the balance was transferred will have a zero
4 balance as of the authorized recovery date. If the balancing or memo account is
5 authorized to continue, the account continues with a zero beginning balance. Thus,
6 there should be no previously reviewed costs included in the account balances
7 when Cal Am submits the account for review.

8 If, however, the balance previously approved for transfer to the CEBA
9 remains in the account balance that is requested for review and recovery at a later
10 date, the potential for double recovery exists. A hypothetical example: In a
11 utility's previous rate case (Rate Case A), the Commission authorized a \$100,000
12 account balance for recovery, but the utility never filed an advice letter to recover
13 the balance. Then in a subsequent rate case (Rate Case B), the utility requests to
14 recover \$300,000, which includes the \$100,000 previously authorized for
15 recovery, but not recovered. If the Commission authorizes the requested
16 outstanding account balance of \$300,000, the utility may file an advice letter to
17 recover \$100,000 citing to Rate Case A as the authority, then file a separate advice
18 letter requesting \$300,000, citing to Rate Case B as the authority, resulting in a
19 total recovery of \$400,000. In this example, the utility would double-recover the
20 \$100,000 approved in Rate Case A.

21 A review of Cal Am's account details revealed that at least two accounts
22 contain "beginning balances" approved for transfer to the CEBA in the last rate
23 case. Cal Am states that it did not file an advice letter to transfer previously
24 authorized balances to the CEBA because of the workload on its Rates section
25 personnel.¹³ Regardless of the reason, it is not appropriate for Cal Am to request

¹³ Cal Am's Response to ORA Data Request RK2-005.4.

1 recovery in this GRC for amounts previously reviewed and authorized for
2 recovery in previous proceedings.

3 Including beginning balances also results in inefficient use of Commission
4 resources, especially when it is not clear from the application that the amounts Cal
5 Am requests to recover included amounts that have already been reviewed and
6 approved for recovery. Further, Cal Am agreed to transfer the balances as part of
7 the Settlement Agreement adopted in D.15-04-007. The terms of the agreement
8 should be enforced by the Commission.

9 To remedy this issue, an adjustment should be made to the beginning
10 balances of all accounts to exclude amounts previously approved for recovery or
11 CEBA transfer.¹⁴ Cal Am may still file to recover previously approved balances
12 via advice letter, as agreed to in the Settlement Agreement for the previous GRC
13 and adopted by the Commission in D.15-04-007.¹⁵

14 The Commission should require Cal Am to separately present any balances
15 that have been previously approved for recovery, along with the outstanding
16 balance in future GRC applications. This will help ensure that no balances that
17 have been previously approved for recovery are double-recovered. It will also
18 promote efficiency in the review process since amounts that been previously
19 approved for recovery can be identified separately from amounts that have not
20 been previously reviewed.

¹⁴ See Chapter 2 for recommendations pertaining to the ESA Memo Account and the MPWMD Conservation Balancing Account.

¹⁵ See the Settlement Agreement adopted in D.15-04-007 at p.158 for the ESA Memo Account and at p.159 for the MPWMD Conservation Balancing Account.

1 **3) Deny Recovery of Account Balances that Cal Am has**
2 **Simultaneously Requested in Other Filings.**

3 Cal Am already filed advice letters to recover two accounts for which it has
4 also requested recovery in this GRC.¹⁶ Any account that is approved for
5 recovery/refund outside this GRC should be denied recovery in the current GRC to
6 prevent double recovery of account balances.

7 **D. Conclusion**

8 The Commission should not allow Cal Am to recover amounts recorded
9 from May 16, 2017 through December 31, 2017, since these amounts will not have
10 been reviewed for reasonableness or prudence. Cal Am's requests for recovery or
11 refund of account balances simultaneously made in other filings should be denied
12 to avoid the potential for double recovery. Further, balances previously approved
13 by the Commission but not yet recovered by Cal Am should not be included in
14 outstanding balances approved in this GRC.

¹⁶ Cal Am filed Advice Letter 1133 seeking recovery of outstanding balances for the NOAA/ESA Memo Account. Cal Am also filed Advice Letter 1102, which was resolved by Commission resolution W-5099, to recover balances for the Sacramento Valley District Conservation or Mandatory Rationing Revenue Adjustment Mechanism Memo Account.

CHAPTER 2: SPECIFIC ACCOUNT REVIEWS AND RECOMMENDATIONS FOR CAL AM'S BALANCING AND MEMO ACCOUNTS

A. Introduction

In its GRC application, Cal Am presents 41 balancing and memo accounts with a combined total of \$213 million to be recovered from ratepayers. This chapter presents findings and recommendations related to each of Cal Am's balancing and memo accounts. For ease of review, ORA follows the same presentation order that Cal Am uses in its testimony. Attachment 1 of the Direct Testimony of Jeffrey Dana presents the May 31, 2016 balance for each account. Unless otherwise specified in the account subsection, ORA reviewed the outstanding account balances up to May 31, 2016.

B. Methodology

All balancing and memo accounts presented in Cal Am's application were initially considered for review. After reviewing Cal Am's testimony, it was determined that review of some of the accounts was unnecessary. Generally, ORA excluded from review: 1) accounts that have been reviewed by the Commission within the last three years; 2) accounts reviewed by the Commission periodically (for example WRAM/MCBA are reviewed for accuracy annually); 3) accounts for which Cal Am did not request recovery and; 4) accounts for which Cal Am has duplicate requests for recovery in other filings. If review of an account was determined to be unnecessary, it is stated in the discussion below related to the account.

To determine reasonableness and prudence of Cal Am's balancing and memo accounts, ORA reviewed the utility's application, the results of the previous GRC decision, Preliminary Statements, past Commission documents related to the accounts, including decisions and advice letters, and responses to data requests.

1 Outstanding account balances reported in Attachment 1 of Jeffrey Dana's
2 testimony were verified to ensure the accuracy of reported balances. Balances
3 were verified on a test basis, which means workpapers and account details were
4 requested for each account and supporting documentation reviewed for selected
5 transactions. Generally, the largest three to five transactions were selected. If
6 account entries were adequately supported and appeared to be reasonable and
7 prudent, no further verification was performed. If the review of underlying
8 documentation revealed discrepancies, then additional data requests were issued to
9 resolve the issue and determine if a recommendation was warranted.

10 Details of recommended adjustments for specific accounts are presented in
11 Attachment 2.

12 **C. Summary of Recommendations**

- 13 • ORA does not object to Cal Am's requests related to 23 balancing and
14 memo accounts. A summary of these specific accounts is listed in
15 Attachment 2.
- 16 • The Commission should reduce the total net over and under collections of
17 all of Cal Am's balancing and memo accounts to \$202,091,699 from Cal
18 Am's requested amount of \$213,079,633. A list of ORA's adjustments for
19 each account is provided in Attachment 2.
- 20 • The Commission should deny Cal Am's request to continue six accounts.
21 These six accounts should be closed. A list of these accounts is provided in
22 Attachment 2.

1 **D. Discussion**

2 **a) Consolidated Expense Balancing Account**

3 Cal Am requests to continue the current balancing account and to recover
4 any additional incremental balances authorized for transfer to the CEBA in this
5 proceeding.¹⁷ Cal Am did not request recovery of \$11,580,827 in outstanding
6 account balances of this account¹⁸ and this account was recently reviewed by the
7 Commission.¹⁹ Therefore, ORA did not review this account in this GRC. ORA
8 does not object to Cal Am's request to add incremental balances approved in this
9 proceeding to the CEBA account.

10 **b) National Oceanic and Atmospheric/Endangered Species**
11 **Act**

12 Cal Am requests permission to: 1) continue the current balancing account,
13 2) transfer \$1,551,197 to the CEBA for recovery, and 3) seek recovery of annual
14 payments as long as payments are required to be made.^{20,21}

15 The Commission should deny Cal Am's request to transfer these balances
16 to the CEBA because the outstanding account balances have already been
17 authorized for recovery via AL-1133, which was filed subsequent to Cal Am's
18 GRC application filing.²² Granting Cal Am's request for recovery could result in
19 double-recovery for outstanding account balances. This issue is addressed in more

¹⁷ The Direct Testimony of Jeffrey Dana at p.3.

¹⁸ The Direct Testimony of Jeffrey Dana, Attachment 1, Item A.

¹⁹ Cal Am's Response to RK2-001, Q(1)(a), Attachment "RK2-001 Question 1.a."

²⁰ The Direct Testimony of Jeffrey Dana at p.4.

²¹ The Direct Testimony of Jeffrey Dana, Attachment 1, Item B.

²² Advice Letter 1133 was filed with the Commission on August 29, 2016.

1 detail above in Chapter 1(C)(2), which discusses Cal Am's requests to recover
2 balances through avenues other than the current GRC.

3 ORA does not oppose Cal Am's request to continue this account and
4 permission to seek annual recovery of payments, subject to the condition that Cal
5 Am is, in fact, required to make additional payments to the California Department
6 of Fish & Game (CDFG) on behalf of the National Oceanic and Atmospheric
7 Administration (NOAA) for Endangered Species Act (ESA) mitigation activities
8 on the Carmel River.²³ Currently, Cal Am believes it will likely need to make
9 payments due to delays in the Monterey Peninsula Water Supply Project, but it is
10 not certain.²⁴ Based on the Settlement Agreement adopted in D.15-04-007, Cal
11 Am may file a Tier 3 advice letter to request inclusion of additional NOAA/ESA
12 related costs in the account in the event the NOAA agreement is extended beyond
13 2016. If the NOAA agreement is not extended beyond 2016, Cal Am should
14 remove the account from the Preliminary Statement once recoveries of final
15 balances are authorized to transfer to the CEBA for recovery.

16 **c) San Clemente Dam Balancing Account**

17 Please refer to Chapter 5 which addresses Cal Am's Special Request #11
18 related to the San Clemente Dam Balancing Account

²³ As authorized in Advice Letter 652-A, and further adopted by D.09-07-021, D.12-006-016, and D.15-04-007.

²⁴ Response to Data Request RK2-003 Q.1.b.ii.

1 **d) Water Revenue Adjustment Mechanism Balancing**
2 **Account & Modified Cost Balancing Account**

3 Cal Am makes three requests regarding the WRAM/MCBA. One, Cal Am
4 requests to continue the account.²⁵ The other two requests are special requests
5 related to the WRAM/MCBA. Chapter 3 addresses Special Request #5 which
6 seeks to remove the 10% amortization cap. Special Request #19, which sought to
7 recover 2015 and 2016 WRAM/MCBA balances from the Monterey District, was
8 determined to be outside the scope of this (A.16-07-002) proceeding.²⁶

9 Cal Am did not request recovery of \$78,814,067 in outstanding account
10 WRAM/MCBA balances.²⁷ Because the WRAM/MCBA outstanding balances
11 are reviewed for accuracy prior to recovery in Cal Am's annual WRAM/MCBA
12 filings to the Commission, review of the outstanding balances is not necessary.
13 ORA does not object to Cal Am's request to continue the WRAM/MCBA.

14 **e) Endangered Species Act (ESA) Memo Account**

15 The Endangered Species Act (ESA) Memo Account tracks costs Cal Am
16 incurred for compliance with the Endangered Species Act, specifically excluding
17 compliance costs associated with the San Clemente Dam. Cal Am seeks
18 continuance of this account to track "unforeseen requirements by governmental
19 agencies" and authorization to transfer outstanding balances to the CEBA.²⁸ The
20 outstanding balance reported by Cal Am as of May 31, 2016 is \$1,223,662.²⁹ ORA
21 does not object to Cal Am's request to continue the account.

²⁵ The Direct Testimony of Jeffrey Dana at p.8.

²⁶ A.16-07-002 Scoping Ruling issued on October 17, 2016, at p.5.

²⁷ The Direct Testimony of Jeffrey Dana, Attachment 1, Item D.

²⁸ The Direct Testimony of Jeffery Dana at pp.8-9

²⁹ The *Direct Testimony of Jeffery Dana, Attachment 1, Item E*

1 The Commission should reduce the outstanding balance on this account to
2 \$333,865 from \$1,223,662. A review of account entries provided by Cal Am
3 reveals account entries that should have been excluded from the outstanding
4 balance. Under the Settlement Agreement adopted in D.15-04-007, Cal Am agreed
5 to transfer the undercollected beginning balance of \$889,797 to the CEBA for
6 recovery. Therefore the beginning balance should not be included in the current
7 account balance since authorizing the cumulative balance could result in double-
8 recovery of approved balances. The outstanding balance on this account should be
9 reduced by \$889,797 to account for this exclusion, leaving a remaining balance of
10 \$333,865.

11 **f) Monterey Peninsula Water Management District**
12 **Conservation (MPWMD) Balancing Account**

13 Cal Am requests to continue the account and most recent volumetric
14 surcharge.³⁰ Cal Am also requests authorization to transfer an outstanding refund
15 balance of -\$888,209 to the CEBA.³¹³² ORA does not oppose continuing the
16 account, but recommends adjusting the account balance to account for balances
17 that should have been transferred to the CEBA.

18 The Settlement Agreement adopted in D.15-04-008 states: “CAW shall use
19 the ending balance at December 31, 2014. CAW shall file a Tier 2 Advice Letter
20 after this date to transfer any over-/under collections to the Monterey CEBA.”
21 Removing the over-collected balance reduces the account balance to an under-
22 collection of \$88. In the Settlement Agreement adopted in D.15-04-007, Cal Am
23 agreed to transfer the December 31, 2014 balance for this account to the CEBA

³⁰ The Direct Testimony of Jeffrey Dana at p.9.

³¹ The Direct Testimony of Jeffrey Dana at p.9.

³² The Direct Testimony of Jeffrey Dana, Attachment 1, Item F.

1 via a Tier 2 Advice Letter.³³ A review of account details for this account shows
2 that Cal Am has yet to file a Tier 2 Advice Letter for this account.³⁴ The
3 \$888,297 previously authorized for recovery³⁵ should be excluded from the
4 balance for this account. Excluding those amounts from the balance presented in
5 this GRC results in an under-collection of just \$88.23.

6 **g) Old Low Income Ratepayer Assistance Program Memo**
7 **Account**

8 Cal Am requests to transfer remaining balances of \$3,710,029 to the
9 CEBA.^{36,37} ORA does not oppose Cal Am's request to transfer the balance.
10 However, the Commission should require Cal Am to update its Preliminary
11 Statement to remove the tariff for the Old LIRA Balancing Account.

12 **h) New Low-Income Ratepayer Assistance Program**
13 **Balancing Account**

14 Cal Am requests the continuance of the balancing account under the same
15 terms and conditions as agreed to in the Settlement in A.13-07-002, which
16 includes annual adjustments to the surcharge to ensure ongoing recovery of any

³³ The Settlement Agreement adopted in D.15-04-007, at p.159.

³⁴ Account details for this account were provided to ORA in Cal Am's response to RK2-005.2 Q.1(a), Item F.

³⁵ Cal Am's response to RK2-005.2, ORA RK2-005.2 Q 001a Item F with descriptions. The sum of all transactions prior to December 31, 2014 is \$888,297.

³⁶ The Direct Testimony of Jeffrey Dana at p.10.

³⁷ The Direct Testimony of Jeffrey Dana, Attachment 1, Item G.

1 over or under collected balances.³⁸ Cal Am's outstanding balance is a refund of
2 -\$18,212.³⁹ ORA does not object to Cal Am's request.

3
4 **i) California American Water Conservation Surcharge**
5 **(CAWCS) Balancing Account**

6 **(i) Cal Am's Proposed Conservation Budget Should be**
7 **Reduced.**

8 Cal Am requests conservation programs remain funded through surcharges
9 and related expenses tracked in the balancing account, and requests that the
10 December 31, 2017 outstanding balance be transferred to the CEBA or recovered
11 via Tier 2 advice letter.^{40 41} Cal Am also proposes overall reductions to each
12 districts' conservation program budgets for the 2018-2020 rate case cycle, and
13 proposes modifying the terms of the account to allow Cal Am to move funds
14 between Best Management Practices (BMP's) as needed.⁴²

15 Cal Am should only be authorized to recover outstanding balances that
16 have been reviewed for reasonableness and prudence. Therefore, recovery should
17 be limited to either the May 31, 2016 balance presented in Cal Am's application,
18 or recovery should be authorized via Tier 2 advice letter subsequent to December
19 31, 2017. Balances must be subject to a reasonableness and prudence review prior

³⁸ The Direct Testimony of Jeffrey Dana at p.10.

³⁹ The Direct Testimony of Jeffrey Dana, Attachment 1, Item H.

⁴⁰ The Direct Testimony of Jeffrey Dana, p.11.

⁴¹ The Direct Testimony of Jeffrey Dana, Attachment 1, Item I shows the May 31, 2016 balance for each district. The total balance for all districts is \$1,270,964.

⁴² The Direct Testimony of Patrick Pilz, pp.2-23. Also see Attachment 3 for a summary of proposed conservation program funding levels.

to authorization for recovery, and authorizing recovery in this proceeding for the December 31, 2017 balance does not allow such a review to occur.

A review of actual conservation program spending provided in Cal Am's 2015 Annual Report to the Commission shows that proposed reductions in conservation program budgets are not in line with actual conservation expenditures, and that further reductions in Cal Am's conservation budget are appropriate. The table below is a comparison of Cal Am's three-year proposed budget and ORA's proposed three-year budget. ORA's proposed three-year budget is based on the lesser of actual expenditures reported in 2015 or Cal Am's proposed 3-year budget for the rate case cycle, for all districts:

Table 2-1. District Level Conservation Program Funding Comparison

District	Cal Am's Proposed Total	ORA's Recommended Total	Difference
San Diego	\$ 256,000	\$ 208,000	\$ 48,000
Ventura	\$ 432,000	\$ 363,000	\$ 69,000
Monterey County Excl MPWMD	\$ 2,298,500	\$ 2,252,500	\$ 46,000
Sacramento	\$ 775,000	\$ 477,000	\$ 298,000
Larkfield	\$ 59,500	\$ 33,100	\$ 26,400
Total	\$ 3,821,000	\$ 3,333,600	\$ 487,400

Recently, the California State Water Resources Control Board (SWRCB) relaxed mandatory drought reduction targets.⁴³ The new Conservation Standards per the State Water Resources Control Board are zero percent reductions for all of Cal Am's districts.⁴⁴ A corresponding reduction in conservation spending is

⁴³ See the SWRCB website:

http://www.waterboards.ca.gov/water_issues/programs/conservation_portal/emergency_regulation.shtml

⁴⁴ See the SWRCB website for updated reduction targets:

1 justified since Cal Am is currently exceeding its conservation targets in all its
2 districts.⁴⁵

3 Cal Am's proposed budget for its conservation programs are significantly
4 higher than its actual spending levels reported to the Commission in its 2015
5 Annual Report. In the "Water Conservation Program 2015 Annual Summary
6 Report" section of its 2015 Annual Report, Cal Am presents a breakdown of actual
7 spending on various conservation programs adopted in its last GRC.⁴⁶ Comparing
8 Cal Am's proposed budget to Cal Am's 2015 Annual Report shows that while Cal
9 Am proposes a number of reductions in conservation program funding, the
10 reductions are not fully in line with actual expenditures. Further reductions to
11 reflect actual expenditures on various programs are appropriate. Cal Am's budget
12 for its conservation program should be based on the lesser of Cal Am's proposed
13 budget or amounts Cal Am actually spends on its conservation programs. Cal
14 Am's estimates are used if they are less than actual amounts because Cal Am
15 anticipates reduced levels of conservation spending for specific conservation
16 programs. Actual amounts are used if they are less than Cal Am's proposed
17 amounts since Cal Am is currently meeting conservation goals in all of its
18 districts. This methodology should result in a forecast that is more in line with Cal
19 Am's actual conservation program expenditures, which have proven to be
20 sufficient in achieving conservation targets.⁴⁷

21 ORA performed an analysis on Cal Am's 2015 conservation program
22 expenditures to determine if Cal Am's proposed conservation budget is

http://www.waterboards.ca.gov/water_issues/programs/conservation_portal/docs/emergency_reg/uw_self-cert_summary.pdf.

⁴⁵ Cal Am's Response to Data Request RK2-004, Q.1(d)(ii).

⁴⁶ Per the Settlement Agreement between ORA and Cal Am adopted in D.15-04-007, at 104.

⁴⁷ Cal Am's Response to Data Request RK2-004, Q.1.(d)(ii).

1 reasonable. The analysis showed that, while Cal Am had proposed certain
2 reductions to its conservation budgets, further reductions to specific conservation
3 programs should be made since Cal Am is meeting conservation targets in all
4 districts at recorded spending levels and as a result does not need funding above
5 current spending levels.⁴⁸ Conservation program levels should be reduced by a
6 total of \$487,400. A detailed breakdown of adjustments to Cal Am's proposed
7 conservation programs by district can be found in Attachment 3.

8 The analysis of Cal Am's conservation programs also revealed that some of
9 Cal Am's proposed reductions were in categories where there was no actual
10 spending. For example, in the last GRC Settlement Agreement, Cal Am was
11 authorized to spend \$46,134 for Commercial, Institutional & Industrial (CII)
12 Rebates in the Los Angeles and Ventura Districts totaling \$92,268. However, CII
13 rebates were funded entirely by the Metropolitan Water District (MWD). Despite
14 not having spent any funds in this category, Cal Am proposes a budget of \$20,000
15 in this GRC for the same unfulfilled activities.⁴⁹ While Cal Am presents this as a
16 reduction in the conservation budget for this line item, in reality Cal Am is
17 requesting more than was previously spent.

18 Another example of a misleading proposal to "reduce" the conservation
19 budget can be found in Attachment 3 of Patrick Pilz's testimony. There, Cal Am's
20 proposed conservation budgets exclude labor costs for conservation personnel that

⁴⁸ Because 2015 was the first year of a three-year rate case cycle, Cal Am presents the information for one-third of its total authorized budget. ORA multiplied reported actual spending on conservation programs by three to make it comparable to Cal Am's proposed 2018-2020 conservation budget. Each conservation best management practice (BMP) in each district was analyzed line-by-line and compared to the amounts proposed by Cal Am in the current GRC. If Cal Am's proposed budget was less than the actual three year spending estimate, no adjustments were made. If Cal Am's actual spending was greater than the actual three-year estimate, then Cal Am's proposed amounts were reduced to actual estimated spending levels.

⁴⁹ Cal Am's proposed funding for CII rebates in the Los Angeles District is \$10,000 and for Ventura is \$10,000 for a total of \$20,000. See the Direct Testimony of Patrick Pilz, Attachment 3, for the Los Angeles and Ventura districts.

1 were included in the conservation budget in the previous GRC. Excluding these
2 labor costs reduces the conservation budget, but Cal Am does not propose to
3 reduce or eliminate conservation positions. Rather, Cal Am requests to include
4 conservation personnel via general rates. Therefore Cal Am's proposed reductions
5 in conservation spending for this line item are not actually a reduction. Cal Am
6 proposes a shift in funding, rather than a meaningful reduction in conservation
7 expenses. The only difference in cost between Cal Am's current budget and Cal
8 Am's proposed budget for conservation positions is that Cal Am proposes funding
9 the conservation personnel in general rates instead of in the one-way balancing
10 account.

11 **(ii) Shifting Funds Between Best Management Practices as**
12 **Needed.**

13 Cal Am's requests the Commission to continue to allow flexibility to move
14 dollars between BMPs within a service area as deemed necessary.⁵⁰ Based upon
15 the significant divergence between previously provided funds and actual spending,
16 ORA recommends against approving this request. Reasonable program budgets
17 should be forecasted, and when actual spending differs, the Commission should
18 reassess the reasonableness of funding that specific program.

19 **(iii) Beginning Balances Should Be Excluded from**
20 **Outstanding Balance.**

21 Cal Am included balances which should have previously been
22 transferred to the CEBA. In the Settlement Agreement adopted in D.15-04-007,
23 Cal Am agreed to transfer the December 31, 2014 balance to the CEBA via a Tier

⁵⁰ The Direct Testimony of Patrick Pilz at p. 23.

1 2 Advice Letter.⁵¹ Cal Am provided account details in its response to ORA Data
2 Request RK2-005.2, stating that the December 31, 2104 balances are as follows:

3 **Table 2-2. December 31, 2014 CAWCS Account Balances, by District.**

District	Amount
Ambler	\$ (7,161.28)
Larkfield	\$ (8,632.04)
Los Angeles	\$ 69,908.24
Monterey	\$ 258,005.20
Monterey WW	\$ (49,158.98)
Sacramento	\$ (117,642.00)
San Diego	\$ 49,358.64
Toro	\$ (10,817.59)
Ventura	\$ (67,900.13)
Total	\$ 115,960.06

4
5 The Commission should reduce the outstanding balance reported by Cal Am in the
6 CEBA by \$115,960 or from \$1,270,964 to \$1,164,004.⁵²

7 **j) Coastal Water Project Memo Account**

8 Cal Am requests the account remain open until all legal issues associated
9 with the development of a new water supply are resolved.⁵³ Cal Am presents a
10 balance of \$8,301,809 for this account.⁵⁴ ORA does not object to Cal Am's
11 request that the account remain open but takes no position on the balance
12 presented.

⁵¹ D.15-04-007 at p.162.

⁵² \$1,270,964 – 115,960 = \$1,164,004.

⁵³ The Direct Testimony of Jeffrey Dana at p.11.

⁵⁴ The Direct Testimony of Jeffrey Dana, Attachment 1, Item J.

1 **k) Coastal Water Project Balancing Account**

2 Cal Am requests to transfer the over-recovered account balance of
3 \$1,623,491 to the CEBA to refund customers for the over-collection.^{55,56} ORA
4 does not object to Cal Am's request to transfer the balance of \$1,623,491 to the
5 CEBA.

6 The Coastal Water Project (CWP) Balancing Account should be closed
7 once balances are transferred to the CEBA. Establishment of the balancing
8 account was never specifically authorized by the Commission and it is not in Cal
9 Am's Preliminary Statement.⁵⁷ However, the Commission implicitly authorized
10 establishment of the account by allowing recovery of CWP Memo Account
11 balances.⁵⁸ Thus, the Commission should order Cal Am to close this account and
12 book any future recoveries authorized for the Coastal Water Project Memo
13 Account directly to the CEBA.

14 **l) Water Contamination Litigation Expenses Memo**
15 **Account**

16 Cal Am requests to continue the account and to transfer outstanding
17 balances of the account to the CEBA, should further costs be incurred.^{59 60} ORA

⁵⁵ The Direct Testimony of Jeffrey Dana at p.11.

⁵⁶ The Direct Testimony of Jeffrey Dana, Attachment 1, Item K.

⁵⁷ Cal Am's Preliminary Statement shows that there is a tariff for the Coastal Water Project Memo Account (Reference Item M), but no tariff for the Coastal Water Project Balancing Account.

⁵⁸ The Commission authorized Cal Am to recover balances recorded in the Coastal Water Project Memo Account. D.06-12-040, Ordering Paragraph No.1 at p.38.

⁵⁹ The Direct Testimony of Jeffrey Dana at p.12.

⁶⁰ The outstanding balance on this account is \$0. See Direct Testimony of Jeffrey Dana, Attachment 1, Item L.

1 recommends the account be closed. This account applies to the Los Angeles and
2 Sacramento Districts. The Sacramento District had a \$0 balance in the previous
3 GRC.⁶¹ In this GRC, both districts have a zero balance. The account should be
4 closed and Cal Am should update its Preliminary Statement to remove the account
5 from its tariff.

6 **m) Catastrophic Event Memo Account**

7 Cal Am requests to continue the account.^{62,63} ORA does not object.

8
9 **n) Seaside Basin Adjudication Balancing Account**

10 Cal Am requests this account remain open to continue tracking the interest
11 and surcharge collections.⁶⁴ Cal Am presents an outstanding balance of
12 \$821,304.⁶⁵ ORA does not oppose Cal Am's request related to this account.

13 **o) Seaside Groundwater Basin Memo Account**

14 Cal Am requests authorization for this account to remain open and to
15 transfer outstanding balances to the CEBA for refund or recovery.^{66,67} ORA
16 recommends that the account should be closed. This account had a zero balance in

⁶¹ See the Settlement Agreement adopted in D.15-04-007 at p.162.

⁶² The Direct Testimony of Jeffrey Dana at p.13.

⁶³ The outstanding balance of this account is \$0. See Direct Testimony of Jeffrey Dana, Attachment 1, Item M.

⁶⁴ The Direct Testimony of Jeffrey Dana at p.14.

⁶⁵ The Direct Testimony of Jeffrey Dana at p.14.

⁶⁶ The Direct Testimony of Jeffrey Dana at p.14

⁶⁷ The outstanding balance of this account is \$0. See the Direct Testimony of Jeffrey Dana, Attachment 1, Item O.

1 the last GRC, and continues to have a zero balance in the current GRC.⁶⁸ Cal Am
2 should update its Preliminary Statement to remove the account from the tariff.

3 **p) Seaside Groundwater Basin Balancing Account**

4 Cal Am requests authorization for this account to remain open and to
5 transfer the outstanding balance of -\$1,140,881 to the CEBA for refund.^{69,70} ORA
6 does not object to Cal Am's request to continue the account. However, the refund
7 amount transferred to the CEBA should be increased from Cal Am's request of
8 \$1,140,881 to \$1,269,116.

9 A review of account details provided by Cal Am reveals that the initial
10 account entry is incorrect. The account entry is described as "True-up per GRC" in
11 the amount of \$128,235. The account balance per the last GRC Settlement
12 Agreement should be \$0.⁷¹ Thus, the "true-up per GRC" entry should be removed.
13 As a result, the refund due to customers should be \$128,235 more than the amount
14 proposed by Cal Am. A total of a \$1,269,116 is due to customers, and should be
15 transferred to the CEBA.

16 **q) Carmel River Mitigation Program Balancing Account**

17 Cal Am requests to keep the account open until payments agreed to in the
18 last settlement are concluded, and requests transferring any outstanding balance to

⁶⁸ See the Settlement Agreement adopted in D.15-04-007 at p.165.

⁶⁹ The Direct Testimony of Jeffrey Dana at p.15.

⁷⁰ The Direct Testimony of Jeffrey Dana, Attachment 1, Item P.

⁷¹ See the Settlement Agreement adopted in D.15-04-007, at p.166.

1 the CEBA.⁷² ORA does not oppose Cal Am's request to continue the account or to
2 transfer the refund balance of -\$1,082,350 to the CEBA.⁷³

3 **r) Pension Balancing Account**

4 Cal Am requests to retain the account and to transfer all balances to the
5 CEBA for recovery.⁷⁴ ORA does not oppose Cal Am's request to continue the
6 account or to transfer the outstanding balance of -\$4,550,568 to the CEBA for
7 refund to customers.⁷⁵ However, Cal Am should correct a minor error on its
8 Preliminary Statement. Cal Am's Preliminary Statement for this account should be
9 corrected to read "Financial Accounting Standards," instead of "Federal Account
10 Standards."

11 **s) Other Post-Employment Benefits Balancing Account**

12 Cal Am requests to retain the account and to transfer the balances of
13 \$218,266 to the CEBA for refund.^{76 77} ORA does not oppose Cal Am's request to
14 continue the account, or for the balance to be transferred to the CEBA. Cal Am's
15 Preliminary Statement for this account should be corrected to read "Financial
16 Accounting Standards," instead of "Federal Account Standards."

⁷² The Direct Testimony of Jeffrey Dana at p.15.

⁷³ The Direct Testimony of Jeffrey Dana, Attachment 1, Item .Q

⁷⁴ The Direct Testimony of Jeffrey Dana at p.16.

⁷⁵ The Direct Testimony of Jeffrey Dana, Attachment 1, Item R.

⁷⁶ The Direct Testimony of Jeffrey Dana at p.16.

⁷⁷ The Direct Testimony of Jeffrey Dana, Attachment 1, Item S.

1 **t) Old Monterey Style Revenue Adjustment Mechanism**
2 **Balancing Account**

3 Cal Am requests to recover residual amounts from previously authorized
4 amortizations and to close the account once it is authorized for recovery.⁷⁸ The
5 outstanding balance is \$947,525.⁷⁹ ORA does not object to Cal Am's requests
6 related to this account.

7 **u) Emergency Rationing Costs Incurred by California**
8 **American Water Memo Account**

9 Cal Am requests the account remain open in the event that emergency
10 rationing is implemented.^{80 81} ORA recommends closing the account. This
11 account currently has a zero balance. A review of the Settlement Agreement
12 adopted in D.15-04-007 shows that this account had a zero balance in the last
13 GRC.⁸² This account is not being utilized by Cal Am, and should therefore be
14 closed. Cal Am may file a Tier 2 Advice Letter to establish a new account in the
15 event that emergency rationing procedures are implemented pursuant to
16 MPWMD's Regulation XV. This would provide proper notice to the Commission
17 of important events in Monterey that may require additional attention.

⁷⁸ The Direct Testimony of Jeffrey Dana at p.17.

⁷⁹ The Direct Testimony of Jeffrey Dana, Attachment 1, Item T.

⁸⁰ The Direct Testimony of Jeffrey Dana at p.18.

⁸¹ The outstanding balance on this account is \$0. See The Direct Testimony of Jeffrey Dana, Attachment 1, Item U.

⁸² Settlement Agreement adopted in D.15-04-007, at p.171.

1 **v) Purchased Water, Purchased Power and Pump Tax**
2 **Balancing Accounts**

3 Cal Am requests to continue the account since Garrapata, Dunnigan,
4 Geyserville, and Ralph Lane will continue to use the account.^{83 84} ORA does not
5 oppose Cal Am's request to continue the account. However, the account should
6 be modified to specifically exclude the Sacramento District.

7 Cal Am was authorized to establish the Special Facilities Fee Memo
8 Account in West Placer via Commission Resolution W-5111. In the previous GRC
9 Settlement Agreement, the request for the Special Facilities memo account was
10 withdrawn since it was duplicative of the Purchased Water, Purchased Power and
11 Pump Tax Balancing Accounts.⁸⁵ Since the Special Facilities Fee Memo Account
12 has been authorized, there is no further need for this account in the Sacramento
13 District.⁸⁶ To ensure that the costs for the Sacramento District are not recorded in
14 two different accounts, the Purchased Water, Purchased Power and Pump Tax
15 Balancing Account should be modified to exclude the Sacramento District.

⁸³ The Direct Testimony of Jeffrey Dana at p.18.

⁸⁴ The outstanding balance on this account is \$195,074. See The Direct Testimony of Jeffrey Dana, Attachment 1, Item V.

⁸⁵ See the Settlement Agreement adopted in D.15-04-007, at p.182

⁸⁶ Cal Am was authorized to establish the Special Facilities Fee Memo Account via Commission Resolution W-5111, effective on October 13, 2016. The Commission had previously rejected Cal Am's Special Request No.23 in D.15-04-007 on account that Cal Am's request did not meet the four-pronged criteria specified in Standard Practice (SP) U-27-W. Cal Am signed a new water purchase agreement with the Placer County Water Agency, which the Commission changed how Cal Am meets the criteria to establish a memo account found in SP U-27-W. See Commission Resolution W-5111 at p.4.

1 **w) Monterey Wastewater Purchased Power Expense**
2 **Balancing Account**

3 Cal Am requests to continue the account and transfer the balance of
4 \$108,920 to the CEBA.^{87 88} ORA does not object to Cal Am's requests related to
5 this account.

6 **x) Monterey Cease & Desist Order Memo Account**

7 Cal Am requests this account remain open with the same provisions found
8 in resolution W-4824, and requests to transfer the balances of \$613,607 to the
9 CEBA.^{89 90} ORA does not oppose Cal Am's request to continue the account.
10 However, Cal Am's request to transfer the balance to the CEBA should be reduced
11 to remove excessive legal fees. The Commission should reduce Cal Am's
12 requested balance of \$613,607 to \$580,571.

13 A review of account details and supporting documentation reveal that Cal
14 Am's legal expenses are excessive.⁹¹ D.15-10-025 reaffirms \$350 per hour as a
15 reasonable rate for lawyers' fees. Multiple lawyers hired by Cal Am were paid at a
16 rate in excess of \$350 per hour. One lawyer was paid at a rate of \$580 per hour. A
17 sample of legal expenses revealed that, out of \$151,406 in legal expenses, \$33,036
18 is attributable to lawyer rates in excess of \$350 per hour. Therefore, the amount
19 the Commission should authorize Cal Am to recover is \$580,571.

⁸⁷ The Direct Testimony of Jeffrey Dana at p.19.

⁸⁸ The Direct Testimony of Jeffrey Dana, Attachment 1, Item W.

⁸⁹ The Direct Testimony of Jeffrey Dana at p.19.

⁹⁰ The Direct Testimony of Jeffrey Dana, Attachment 1, Item X.

⁹¹ Cal Am's Response to Data Request RK2-005.3. Q.1(b)(vii), Attachments 1-11.

1 **y) Affiliate Transaction Memo Account**

2 Cal Am requests to retain the account and to transfer the outstanding refund
3 balance of -\$9,263 to the CEBA.^{92 93} ORA does not oppose Cal Am's requests
4 related to this account.

5 **z) Los Angeles Main San Gabriel Contamination Memo**
6 **Account**

7 Cal Am requests to transfer outstanding balances to the CEBA and to
8 continue the account.^{94 95} ORA recommends that the account should be closed.
9 The Settlement Agreement adopted in D.15-04-007 indicates there was a zero
10 balance in the previous GRC.⁹⁶ The account should close based on a continuing
11 lack of activity. Cal Am should update its Preliminary Statement to remove the
12 account from its tariffs.

13 **aa) Aquifer Storage & Recovery Well 4 Memo Account**

14 California American Water requests that \$195,530 be transferred to
15 the CEBA and to close the account.^{97 98} ORA does not object to Cal Am's
16 requests related to this account.

^{92 93} The Direct Testimony of Jeffrey Dana at p.20.

⁹⁴ The Direct Testimony of Jeffrey Dana, Attachment 1, Item Y.

⁹⁵ The Direct Testimony of Jeffrey Dana at p.20.

⁹⁶ The outstanding balance on this account is \$0. See The Direct Testimony of Jeffrey Dana, Attachment 1, Item Z.

⁹⁷ See the Settlement Agreement adopted in D.15-04-007 at p. 176

⁹⁸ The Direct Testimony of Jeffrey Dana at p.20.

⁹⁹ The Direct Testimony of Jeffrey Dana, Attachment 1, Item AA.

1 **bb) Statewide Non-Revenue Water Action Plan Memo**
2 **Account**

3 Cal Am requests to transfer outstanding balances of \$75,441 to the CEBA
4 and to close the account.^{99 100} ORA does not object to Cal Am's requests related
5 to this account.

6 **cc) Monterey Leak Adjustments Memo Account**

7 Cal Am states it will file an advice letter to request that the balance be
8 transferred to the CEBA.^{101 102} ORA plans to review this balance when the advice
9 letter is filed.

10 **dd) Sand City Desalination Plant Purchased Water**
11 **Balancing Account**

12 Please refer to testimony of ORA witness, Suzie Rose, related to
13 continuation of the account.

⁹⁹ The Direct Testimony of Jeffrey Dana at p.22.

¹⁰⁰ The Direct Testimony of Jeffrey Dana, Attachment 1, Item BB.

¹⁰¹ The Direct Testimony of Jeffrey Dana at p.22.

¹⁰² The outstanding balance on this account is \$3,885,443. See The Direct Testimony of Jeffrey Dana, Attachment 1, Item CC.

1 **ee) Conservation/Rationing Memo Account**

2 Cal Am requests to transfer outstanding balances of \$2,325,064 to the
3 CEBA and to keep the account open.^{103 104} ORA does not object to Cal Am's
4 requests related to this account.

5 **ff) Chrome 6 Memo Account**

6 Cal Am requests to transfer outstanding balance of \$2,717,096 to the
7 CEBA and if the entire balances are transferred, close the account.^{105 106} ORA
8 does not object to Cal Am's requests related to this account.

9 **gg) Garrapata Service Area Memo and Balancing Accounts**

10 Cal Am requests to transfer any outstanding balance to the CEBA and to
11 continue the account.^{107 108} ORA does not object to Cal Am's requests related to
12 this account.

¹⁰³ The Direct Testimony of Jeffrey Dana at p.23.

¹⁰⁴ The Direct Testimony of Jeffrey Dana, Attachment 1, Item EE.

¹⁰⁵ The Direct Testimony of Jeffrey Dana at pp.23-24.

¹⁰⁶ The Direct Testimony of Jeffrey Dana, Attachment 1, Item FF.

¹⁰⁷ The Direct Testimony of Jeffrey Dana at p.25.

¹⁰⁸ The outstanding balance of this account is \$0. See Direct Testimony of Jeffrey Dana, Attachment 1, Item FF.

1 **hh) Garrapata Safe Drinking Water State Revolving Fund**
2 **(“SDWSRF”) Loan Repayment Balancing Account**

3 Cal Am requests to continue the account to track the surcharge and loan.¹⁰⁹
4 ¹¹⁰ ORA does not object to Cal Am’s requests related to this account.

5 **ii) Tax Act Memo Account**

6 Cal Am requests to transfer the balance to the CEBA and to keep the
7 account open.¹¹¹ There is a zero balance in the account.¹¹² ORA recommends the
8 account should be closed.

9 It is inappropriate to continue Cal Am’s Tax Act Memo Account because
10 Cal Am’s request to continue the account is in violation of Resolution L-411A.
11 Cal Am agreed to establish the Tax Act memo account “...in line with Commission
12 Resolution L-411A” in the last GRC.¹¹³ The purpose of the account was to track
13 the effects of bonus depreciation on revenue requirement, specifically for the
14 period until the utilities very next GRC.¹¹⁴ Resolution L-411A states:

15 “This memo account shall track on a CPUC-jurisdictional, revenue
16 requirement basis the impacts of the New Tax Law not otherwise reflected
17 in rates during the period starting on the date of this resolution *until the*

¹⁰⁹ The Direct Testimony of Jeffrey Dana at p.24.

¹¹⁰ The outstanding balance on this account is \$6,311. See Direct Testimony of Jeffrey Dana, Attachment 1, Item GG.

¹¹¹ The Direct Testimony of Jeffrey Dana at p.25.

¹¹² The Direct Testimony of Jeffrey Dana, Attachment 1, Item II.

¹¹³ See the Settlement Agreement adopted in D.15-04-007 at p.76.

¹¹⁴ Bonus depreciation allows a utility to take additional depreciation on qualifying assets, effectively reducing the utility’s tax liability.

1 *effective date of the revenue requirement changes in each Covered Utility's*
2 *next General Rate Case.*¹¹⁵,

3 As demonstrated above, the account is explicitly intended to only cover the period
4 inbetween rate cases, until the next GRC where bonus depreciation could be
5 forecasted in rates.¹¹⁶ Cal Am should have established the account prior to the last
6 GRC, but did not. Rather, Cal Am established the memo account as part of the
7 Settlement Agreement adopted in D.15-04-007.¹¹⁷ Thus, in accordance with
8 Resolution L-411A, Cal Am should close the account in the following General
9 Rate Case, which is this Rate Case (A.16-07-002).¹¹⁸ Therefore, the account
10 should be closed and bonus depreciation should be forecasted in rates instead.¹¹⁹

11 Another reason to close the account is that the account may not actually
12 function in accordance with Resolution L-411A. In response to an ORA data
13 request, Cal Am indicated that the account is not set up to track refunds. A
14 footnote on Cal Am's workpaper states "Absent taxable income there would be no
15 [domestic manufacturing deduction] DMD calculation, therefore there would be a
16 refund, but the memo account does not account for refunds [Emphasis and

¹¹⁵ Commission Resolution L-411A, Ordering Paragraph No.3, emphasis added

¹¹⁶ Resolution L-411A, Ordering Paragraph No.6.

¹¹⁷ See the Settlement Agreement adopted in D.15-04-007 at p.76.

¹¹⁸ Resolution L-411A, Ordering Paragraph No.4 states "If, at the end of the Memo Account Period, this memo account reflects a net revenue requirement increase, the memo account shall be terminated without any impact on rates." Cal Am's \$0 balance indicates a net revenue requirement increase since the purpose of the account is to track refunds to rate payers due to changes (reductions) in revenue requirement caused by taking bonus depreciation. Therefore, a zero balance indicates that there is either no revenue requirement increase or there is a net revenue requirement increase.

¹¹⁹ As directed by Ordering Paragraph No.6 in Resolution L-411A. Ordering paragraph No. 6 states "In each Covered Utility's next General Rate Case (GRC), or at such other time as ordered in that GRC decision, the Commission shall address the disposition of amounts (a) recorded in the memo account and (b) forecast for the remainder of the Memo Account Period, and may reflect any net revenue requirement decrease in prospective rates."

1 clarifying language added].¹²⁰ Resolution L-411A orders utilities to track
2 decreases in revenue requirement resulting from increases in deferred tax reserve
3 from taking bonus depreciation, an inherent refund.¹²¹ The utilities may use
4 offsetting investments to reduce any amounts due back to customers; however
5 absent any offsetting investments, the account must be a refund to customers. The
6 fact that Cal Am's workpaper indicates that the account is not set up to account for
7 refunds indicates that the account is not functioning in line with Resolution L-
8 411A, as Cal Am agreed to in the last GRC.¹²² Thus, the account should be
9 closed.

10 Lastly, there is reason to close the account due to Cal Am's Special Request
11 #12 which would create a conflict with this account. Cal Am's Special Request
12 #12 requests authorization for a bonus depreciation memorandum account.
13 Discussion related to Special Request #12 is addressed by ORA witness Mukunda
14 Dawadi.

15 Because Cal Am does not appear to be utilizing the account "in line with
16 Resolution L-411A" as agreed to in the previous GRC settlement, and because Cal
17 Am is proposing a Special Request that is in direct contradiction to the terms
18 outlined in Resolution L-411A, the account should be closed.¹²³

¹²⁰ See Cal Am's Response to Data Request MC8-009, Attachment "ORA MC8-009 Q005 Attachment" under "FACTS" at the bottom of the workpaper.

¹²¹ Resolution L-411A, Ordering Paragraph No.3.

¹²² Settlement Agreement adopted in D.15-04-007 at p.76.

¹²³ The Settlement Agreement adopted in D.15-04-007 at p.76.

1 **jj) West Placer Memo Account**

2 Cal Am requests the account remain open. There is no objection to Cal
3 Am's request to continue the account.¹²⁴ Cal Am did not request recovery of
4 account balances.¹²⁵ ¹²⁶ Thus, ORA did not conduct any review of account
5 balances.

6 **kk) Sacramento District Voluntary Conservation or**
7 **Mandatory Rationing Revenue Adjustment Mechanism**
8 **Memo Account.**

9 Cal Am requests that this account remain open. ORA does not object to
10 continue the account, though the account should be modified to exclude lost
11 revenues. The account may continue to track implementations costs and water use
12 violations per Commission Resolution W-4976. Cal Am did not request a review
13 of the balance in this GRC.

14 The account has been authorized for recovery (transfer to CEBA) via
15 Ordering Paragraph #1 of Commission Resolution W-5099 effective 6/28/16.¹²⁷

16 Commission Resolution W-4976 and Advice Letter 1038 state "Lost
17 revenues associated with reduced sales as a result of activation of either Tariff
18 Rule 14.1 or Schedule 14.1 for a utility without a full revenue decoupling Water
19 Revenue Adjustment Mechanism (WRAM) should be tracked in a separate memo
20 account for disposition as directed or authorized from time to time by the

¹²⁴ The Direct Testimony of Jeffrey Dana at p.25.

¹²⁵ The outstanding balance of this account is \$5,307,219. See Direct Testimony of Jeffrey Dana, Attachment 1, Item JJ.

¹²⁶ The outstanding balance of this account is \$4,097,614. See Direct Testimony of Jeffrey Dana, Attachment 1, Item KK.

¹²⁷ Initiated via AL-1102 and AL 1102-A.

Commission.” The Settlement Agreement adopted in D.15-04-007 authorized Cal Am to establish a full revenue decoupling mechanism in the Sacramento district.¹²⁸ According to Advice Letter 1118-A, Cal Am established the WRAM/MCBA in the Sacramento District via Advice Letter 1072-B. Advice Letter 1072-B became effective on 1/1/2015. Thus, this account must exclude costs related to lost revenues as authorized via Resolution W-4976 and as specifically described in Cal Am’s Advice Letter 1038 and associated Preliminary Statement. The account should continue but must specifically exclude lost revenues. Cal Am should update its Preliminary Statement to reflect the recommended changes to the account, as well.

**ll) Dunnigan Environmental Improvement and
Compliance Issues Memo Account**

Cal Am requests to transfer the outstanding balance of \$35,023 to the CEBA and for the account to stay open.^{129 130} ORA does not object to Cal Am’s requests related to this account.

mm) Dunnigan Consulting Memo Account

Cal Am requests to transfer the outstanding balance of \$75,000 to the CEBA and for the account to stay open.^{131 132} ORA does not object to Cal Am’s requests related to this account.

¹²⁸ The Settlement Agreement adopted in D.15-04-007 at p.70.

¹²⁹ The Direct Testimony of Jeffrey Dana at p.26.

¹³⁰ The Direct Testimony of Jeffrey Dana, Attachment 1, Item LL.

¹³¹ The Direct Testimony of Jeffrey Dana at p.26.

¹³² The Direct Testimony of Jeffrey Dana, Attachment 1, Item MM.

1 **nn) Dunnigan Closing Cost Memo Account**

2 Cal Am requests to transfer the outstanding balance of \$10,584 to the
3 CEBA and for the account to stay open.^{133 134} ORA does not object Cal Am's
4 balance but the account should close once the balance is transferred to the CEBA.

5 **oo) Water-Energy Nexus Program Memo Account**

6 Cal Am requests to transfer the outstanding balance, which is \$0, to the CEBA and
7 to keep the account open.^{135 136} ORA does not object to Cal Am's requests related
8 to this account.

9 **E. Conclusion**

10 Ratepayers should not have to pay for unreasonable expenses recorded in
11 the balancing and memo accounts. The recommendations contained within this
12 chapter are reasonable because they help ensure that ratepayers do not incur
13 unreasonable surcharges. Additionally, these recommendations reduce the number
14 of inactive accounts from Cal Am's tariffs.

15 ORA does not object to Cal Am's request regarding 23 of its balancing and
16 memo accounts, but recommends that the Commission adopt adjustments to
17 reduce recoverable costs or to increase the refund due to customers, as described
18 above. The result is a reduction of Cal Am total outstanding balances from
19 \$213,079,633 to \$206,286,664.

¹³³ The Direct Testimony of Jeffrey Dana at p.27.

¹³⁴ The Direct Testimony of Jeffrey Dana, Attachment 1, Item NN.

¹³⁵ The Direct Testimony of Jeffrey Dana at p.27.

¹³⁶ The outstanding balance of this account is \$0. See Direct Testimony of Jeffrey Dana, Attachment 1, Item OO.

1 Additionally, Cal Am's request to continue eight accounts should be denied
2 and the accounts should be closed because the accounts are not being utilized, or
3 circumstances have changed making the account no longer necessary.

4 Adopting these recommendations will help ensure Cal Am customers pay
5 for only just and reasonable expenses incurred by Cal Am, and reduce the number
6 of accounts which may no longer be necessary.

7

1 **CHAPTER 3: SPECIAL REQUEST #5 - REMOVAL OF THE 10 PERCENT**
2 **RECOVERY CAP ON WRAM/MCBA BALANCES**

3 **A. Introduction**

4 Cal Am requests to remove the current 10% cap on WRAM balancing
5 accounts and instead proposes a revised recovery schedule.¹³⁷ Cal Am argues that
6 the 10% cap is arbitrary,¹³⁸ may limit its ability to conserve in times of need,¹³⁹
7 causes intergenerational issues with recovery of balances, especially considering
8 large balances that have accumulated in the accounts,¹⁴⁰ and sends incorrect price
9 signals to customers.¹⁴¹ Thus, Cal Am is concerned that it will take many years to
10 recover accumulated balances, particularly if drought conditions continue to
11 persist.¹⁴²

12 Cal Am proposes a recovery schedule of 1 year for balances 2%-5% of last
13 authorized revenue; an 18-month recovery period for balances 5%-15% of last
14 authorized revenue; and a 19 to 36 month recovery period for balances 15% to
15 30% of last authorized revenue.¹⁴³

16 **B. Summary of Recommendations**

17 The Commission should deny this request and the current 10% cap on
18 recovery should remain in place. This will help ensure that significant net

¹³⁷ The Direct Testimony of Jeffrey Linam, at p.20.

¹³⁸ The Direct Testimony of Jeffrey Linam, at p.21.

¹³⁹ The Direct Testimony of Jeffrey Linam, at p.21.

¹⁴⁰ The Direct Testimony of Jeffrey Linam, at p.23.

¹⁴¹ The Direct Testimony of Jeffrey Linam, at p. 22.

¹⁴² The Direct Testimony of Jeffrey Linam on p. 22, LL 5-7.

¹⁴³ The Direct Testimony of Jeffrey Linam on p. 22, LL 19-26.

1 WRAM/MCBA under-collected balances do not result in either rate shock or
2 unreasonably high rates.

3 **C. Discussion**

4 Cal Am's proposed rate recovery schedule should be denied and the current
5 10% cap should remain in place. Cal Am has not provided sufficient justification
6 in its application to prove that the adjustment is necessary.

7 Cal Am's claim that the 10% recovery cap is arbitrary is incorrect. A 10%
8 cap on WRAM/MCBA recovery is the amount the Commission determined to be
9 appropriate to prevent excessive rates. The Commission addressed a similar
10 request regarding WRAM/MCBA recovery in A.10-09-017, in which Cal-Am was
11 initially a participant but later withdrew from the proceeding. Finding of Fact
12 No.11 of D.12-04-048 (the final decision in the proceeding) states:

13 "Applicants' proposals to shorten the amortization period for net
14 WRAM/MCBA under-collections could expose customers to substantial
15 rate increases without any notice or opportunity to be heard. For example,
16 under these proposals, the WRAM/MCBA amortization period could in
17 some circumstances double the associated surcharge on a customer's
18 bill."¹⁴⁴

19 Further, Conclusion of Law No. 13 states "It is unreasonable to accelerate
20 amortization of 2010 WRAM/MCBA balances. Such amortization would result in
21 excessive impacts in many districts in 2012."¹⁴⁵ Then the Commission adopts the
22 10% rate cap in Ordering Paragraph No.3, which states: "We adopt the
23 amortization schedule set forth in Appendix A with a cap on total net Water

¹⁴⁴ D.12-04-048 at p.37.

¹⁴⁵ D.12-04-048 at p.41.

1 Revenue Adjustment Mechanism/Modified Cost Balancing Account
2 (WRAM/MCBA) surcharges of 10% of the last authorized revenue
3 requirement.”¹⁴⁶ Thus, Cal Am’s claim that the 10% WRAM/MCBA recovery cap
4 is arbitrary is wrong. The Commission adopted the 10% cap to ensure that
5 ratepayers would not experience excessive rates. Cal Am has provided no
6 evidence that eliminating the 10% cap would not result in excessive rates. Thus,
7 the 10% cap should remain in place.

8 Cal Am’s claim that the 10% recovery cap may limit Cal Am’s ability to
9 conserve is also incorrect. Anticipated levels of conservation are forecast into
10 general rates, and should not affect Cal Am’s ability to conserve. In addition, Cal
11 Am receives funding for its conservation programs through a separate surcharge.
12 Cal Am also has an entirely separate Conservation/Rationing Memo Account to
13 track any expenses incurred by Cal Am to activate Rule 14.1 and Schedule 14.1 in
14 case water usage reductions are mandated. Thus, Cal Am’s ability to conserve
15 should not be impaired by the 10% recovery cap and should not be considered a
16 reason to remove this critical ratepayer protection.

17 Cal Am states there may be intergenerational issues if the 10% recovery
18 cap is not lifted. Intergenerational issues are not unique to the WRAM/MCBA, but
19 apply to any balance or memo account. The issue here is not that intergenerational
20 issues caused the recovery cap -- those are to be expected for any balancing
21 account. The reason it is an issue for Cal Am is due to problems caused by the
22 relatively large accumulated balances in the accounts. The 10% recovery cap
23 would not delay recovery of under-collected balances if the under-collected
24 balances were a smaller amount. While the 10% recovery cap may temporarily
25 alleviate issues associated with large under-collected balances in the short-term, it
26 will not address the reasons large balances accumulated in the account in the first

¹⁴⁶ D.12-04-048 at pp.41-42.

1 place. Thus, rather than eliminating a ratepayer protection, the underlying issues
2 which cause large balances should be addressed.

3 **D. Conclusion**

4 The Commission should deny this request and the current 10% cap on
5 recovery should remain in place to help ensure that significant net WRAM/MCBA
6 under-collected balances do not result in either rate shock or unreasonably high
7 rates. Cal Am has not provided sufficient justification to remove the 10% cap. Cal
8 Am's claim that the 10% cap is arbitrary is directly contradicted by past
9 Commission decisions, which clearly establish the 10% cap as a prudent ratepayer
10 protection. Cal Am's claim that the 10% recovery cap will limit their ability to
11 conserve is also incorrect since conservation efforts are forecast into rates. Lastly,
12 intergenerational issues are not unique to the WRAM/MCBA. Intergenerational
13 problems are actually caused by the creation and approval of any memo or
14 balancing account which permits costs experienced in one period of time to be
15 recovered in a later time period and by a different set of customers. For these
16 reasons, Cal Am's request to remove the 10% cap on WRAM/MCBA recovery
17 should be denied.

1 **CHAPTER 4: SPECIAL REQUEST #8 - AUTHORIZATION TO ESTABLISH AN**
2 **AMI/LEAK ADJUSTMENT BALANCING ACCOUNT.**

3 **A. Introduction**

4 Cal Am makes Special Request #8 to establish an AMI/Leak Adjustment
5 Balancing Account. Cal Am requests to establish the account to track the
6 differences between the level of proposed leak adjustments authorized for 2018-
7 2020 and the level actually incurred. Cal Am requests establishment of the
8 account because of uncertainty in the amount of leak adjustment reductions that
9 will occur as a result of the installation of AMI meters.

10 **B. Summary of Recommendations**

- 11 • Cal Am's request to establish an AMI/Leak Adjustment Balancing Account
12 should be denied because Cal Am's request to fully deploy AMI before the
13 results of the pilot program have been evaluated by the Commission is
14 unreasonable.
- 15 • A number of issues have been identified in the existing process by which
16 Cal Am provides leak adjustments. Allowing a new balancing account to
17 track additional adjustments for future recovery from ratepayers would
18 increase the ability of Cal Am to abuse the process.

19 **C. Discussion**

20 **1) An AMI Leak Adjustment Balancing Account is Not Necessary**
21 **Prior to Completing AMI Pilot Programs**

22 The Commission should deny Cal Am's request to establish an AMI/Leak
23 Adjustment Balancing Account because it would not be prudent for the
24 Commission to adopt Cal Am's request for full implementation of Advance Meter
25 (AMI) at this time. As discussed in the testimony of ORA witness Justin Menda,
26 it would be imprudent for the Commission to authorize Cal Am to fully deploy

1 AMI since the AMI pilot programs in Cal Am's Monterey and Ventura Districts
2 are currently ongoing, and the results of the pilot programs are still unknown. Both
3 AMI pilot programs have only recently been implemented, thus the results of the
4 pilot program are currently pending. The pilot programs should be completed, the
5 Commission should evaluate results of the pilot programs, and the net benefits (or
6 costs) to ratepayers measured, demonstrated and examined carefully prior to full
7 deployment of AMI. If Cal Am's request to fully deploy AMI is denied, then Cal
8 Am's request to establish an AMI/Leak Adjustment Balancing Account becomes
9 moot.

10 **2) A New Balancing Account would Reduce Incentives to Control**
11 **Costs and Increase the Potential for Abuse in the Leak Adjustment**
12 **Process**

13 It would also be imprudent for the Commission to authorize Cal Am to
14 establish a leak adjustment balancing account because there are number of issues
15 with Cal Am's existing leak adjustment process. As detailed in the Testimony of
16 Wenli Wei, ORA identified numerous issues in the existing process by which Cal
17 Am provides and tracks leak adjustments.

18 Most of the problems that ORA identified with Cal Am's existing leak
19 adjustment process would be exacerbated if Cal Am had the ability to track
20 additional leak adjustments in a balancing account for future recovery. For
21 example, the current incentive for Cal Am to control program costs through use of
22 an adopted budget would be significantly diminished by the creation of a
23 balancing account to track and recover leak adjustment costs beyond those
24 forecasted and budgeted. Furthermore, the costs of Cal Am's leak adjustment
25 program should be allocated between ratepayers and shareholders before
26 considering the creation of a new balancing account. Cal Am's shareholders
27 receive a public relations benefit from providing customers with leak adjustments,
28 yet the costs of providing such adjustments are currently fully borne by ratepayers.
29 Prior to considering the implementation of a balancing account to track any

1 additional costs, the Commission should first require an allocation of program
2 costs to shareholders.

3 **3) If A New Balancing Account is Approved it should be a One-Way**
4 **Account**

5 Cal Am indicates that it expects a reduction in the number of leak
6 adjustments necessary if AMI meters are installed.¹⁴⁷ This implies that the account
7 should be a one-way balancing account because a reduction in the amount of
8 forecasted leak adjustments could only result in a refund to customers. However,
9 Cal Am does not specifically request to establish a one-way balancing account.
10 Rather, Cal Am requests to establish a regular, two-way balancing account. Thus,
11 if the actual amounts of leak adjustments are in excess of forecasted amounts and
12 these excesses are allowed to be tracked and recovered through use of a two-way
13 balancing account, then ratepayers will pay additional surcharges on top of general
14 rates. The increasing use of utility surcharges is a significant problem that was
15 highlighted in a 2012 report published by the American Association of Retired
16 Persons.¹⁴⁸ The report states:

17 “In a rate case, a utility is allowed a reasonable level of revenues to
18 recover its operating expenses as well as an opportunity to earn a fair
19 return on its prudently incurred investment in used and useful plant.
20 In between rate cases, the benefit of any cost reductions would flow
21 back to the utility as higher profits. For costs that are to be “tracked”
22 through a surcharge, the utility is usually required to return any
23 under-spending to ratepayers, so the utility is not benefitted by cost-
24 cutting efforts. The surcharge can thus remove or reduce the utility’s
25 incentive to reduce costs. Guaranteeing recovery of a specific

¹⁴⁷ The Direct Testimony of Jeffrey Linam at pp.30-31.

¹⁴⁸, *Increasing Use of Surcharges on Consumer Utility Bills* prepared by Larkin & Associates, PLLC for AARP in May 2012, at p.9.

1 expense reduces the utility's incentives to control costs, and thus
2 shifts the burden of cost increases between rate cases from
3 shareholders onto ratepayers.”¹⁴⁹

4 To reinforce Cal Am's incentive to control program costs, Cal Am's
5 request to establish an AMI Leak Adjustment Balancing Account should be
6 denied. If the Commission ultimately approves a new balancing account to track
7 leak adjustments, it should be specified as a one-way balancing account that can
8 only track and return to ratepayers program costs less than those budgeted and
9 approved in the instant proceeding.

10 **D. Conclusion**

11 Cal Am's request to establish an AMI/Leak Adjustment Balancing Account
12 should be denied. It should be denied because the results of Cal Am's AMI pilot
13 programs should be completed and evaluated to ensure that full deployment of
14 AMI is reasonable and justified. Furthermore, there have been numerous issues
15 found in Cal Am's existing process of providing and accounting for leak
16 adjustments. Creating a new balancing to track and recover additional program
17 costs from ratepayers would diminish or remove incentives to accurately budget
18 and control costs. Cal Am's Special Request No.8 should be denied.

¹⁴⁹ *Increasing Use of Surcharges on Consumer Utility Bills* prepared by Larkin & Associates, PLLC for AARP in May 2012, at p.9.

1 **CHAPTER 5: SPECIAL REQUEST #11 - SAN CLEMENTE DAM REMOVAL**
2 **PROJECT BALANCING ACCOUNT**

3 **A. Introduction**

4 California American Water requests authority to amortize costs associated
5 with the San Clemente Dam removal project.¹⁵⁰ Jeffrey T. Linam’s testimony
6 supports this special request.¹⁵¹ Jeffrey Linam and Jeffrey Dana make additional
7 requests regarding the balancing account in their direct testimony.^{152 153} Mark
8 Schubert’s testimony provides details and updates of the project.¹⁵⁴ Cal Am
9 requests a review of interim dam and environmental safety measure costs and
10 actual expenditures for the project, to implement the updated levelized revenue
11 requirement in base rates beginning January 1, 2018, and to extend the
12 amortization period for 6 years.¹⁵⁵ Beginning in 2018, Cal Am requests to
13 amortize total project costs by recovering \$755,207 per month for 20 years.¹⁵⁶

14 **B. Summary of Recommendations**

- 15 • The Commission should reduce Cal Am’s monthly amortization
16 amount by \$4,248 per month. This adjustment reduces total project

¹⁵⁰ A.16-07-002 at p.12.

¹⁵¹ The Direct Testimony of Jeffrey Linam at p.35.

¹⁵² Cal Am requests to extend the amortization period by an additional 6 year period in the Direct Testimony of Jeffrey Linam at p.35.

¹⁵³ Cal Am request to implement the “updated levelized revenue requirement” beginning on January 1, 2018, and to reset the 20 year recovery period, also beginning on January 1, 2018 in the Direct Testimony of Jeffrey Dana at p.6.

¹⁵⁴ The Direct Testimony of Mark Schubert at p.209.

¹⁵⁵ See the Direct Testimony of Jeffrey Linam at p.35 and the Direct Testimony of Jeffrey Dana at p.6.

¹⁵⁶ The Direct Testimony of Jeffrey Dana, Attachment 2.

costs by \$4,231,036 over Cal Am's proposed 20 year amortization period.

- ORA identified \$36,071 in expenses that are not just or reasonable. The Commission should remove these amounts from Cal Am's recoverable project costs.
- After removal of double-counted uncollectible amounts and unreasonable expenses, the monthly amortization amount should be \$750,560.

C. Discussion

1) Uncollectibles Should be Removed from Recoverable Project Costs

Cal Am's proposed amortization schedule would directly result in double recovery of uncollectible revenues. Uncollectible revenues are included in Cal Am's project amortization schedule¹⁵⁷ and also in Cal Am's RO model.¹⁵⁸ Per D.12-06-040 "the revenue requirement on the regulatory asset shall move into base rates at the time of the first General Rate Case after the final review of all project costs."¹⁵⁹ Moving the project into base rates will increase the total revenue requirement. Cal Am's RO model utilizes a fixed uncollectible rate based on the total revenue requirement. Therefore, increasing the total revenue requirement automatically increases the total uncollectible amount. Including uncollectible revenues in the San Clemente Dam Removal Project amounts results in the uncollectible rate in the RO model being applied on top of the uncollectible revenues in the San Clemente Dam Removal Project amount, resulting in Cal Am

¹⁵⁷ The Direct Testimony of Jeffrey Dana, Attachment 2.

¹⁵⁸ See Cal Am's RO model workpaper titled "ALL_CH04_O&M_WP_Uncollectible."

¹⁵⁹ Ordering Paragraph No.2(o).

1 receiving funding for uncollectibles twice. Thus, uncollectible revenue amounts,
2 beginning in January 2018 to the end of the 20-year recovery period, should be
3 removed from the total costs for the San Clemente Dam removal project. The
4 monthly uncollectible revenue amounts included for the San Clemente Dam
5 removal project are \$4,248.¹⁶⁰ Removal of uncollectible amounts, at the 12% pre-
6 tax rate of return used by Cal Am, reduces the total project cost by \$4,231,036
7 over the 20-year amortization period. The resulting monthly amortized cost is
8 \$750,959 per month.¹⁶¹

9 **2) The Commission Should Remove Unreasonable Costs from the**
10 **Account**

11 Cal Am presents a May 31, 2016 account balance of \$92,970,903¹⁶² which
12 includes \$26,802,658 in pre-construction costs previously authorized in D.12-06-
13 040 and reductions for surcharges collected. Of the total remaining balance, ORA
14 identifies \$36,071 in project costs that are unreasonable and should be removed.
15 This total adjustment is comprised of approximately \$30,000 in filming release
16 forms and \$6,000 in catering invoices—neither of which can be considered
17 necessary for completing the approved work. See Attachment 4 for specific
18 adjustments.

¹⁶⁰ See the Direct Testimony of Jeffrey, Attachment 2, beginning in January 2018.

¹⁶¹ ORA requested a Microsoft Excel version of Attachment 2 to the Direct Testimony of Jeffrey Dana in ORA Data Request DG-005. Cal Am provided “Cal Am SCD Attachment DG-005 Question 1a.xlsx,” in response to ORA DG-005. “Cal Am SCD Attachment DG-005 Question 1a.xlsx” shows the calculation details for Cal Am’s proposed monthly amortization amounts for the San Clemente Dam project costs. ORA used Excel’s GoalSeek function to recalculate monthly amortization amounts, excluding uncollectible amounts and unreasonable amounts, beginning in January 2018. Please see Attachment 5 for workpapers.

¹⁶² The Direct Testimony of Jeffrey Dana, Attachment 2, Item C.

1 **3) The Commission Should Require Cal Am to Organize**
2 **and Reconcile Documentation Supporting Requested**
3 **Balances for Recovery**

4 Cal Am provided invoices to support the remaining balance for the San
5 Clemente Dam removal project.¹⁶³ The approximate total of all the invoices Cal
6 Am provided is \$70,701,705. The amount is approximate since ORA had to
7 manually input the invoice amounts into an excel spreadsheet to determine the
8 total amount. The invoices, totaling approximately 2,800 pages, were provided by
9 Cal Am unsorted in 3 large PDF files. Some of the images are not very clear, there
10 are pages missing or, in one instance, there was an invoice dated for November 31,
11 2015 – a fictional date.

12 ORA attempted to tie invoices to amounts provided in Attachment 2 of
13 Jeffrey Dana’s testimony in the Column titled “Additional Expenditures.” Cal Am
14 had indicated that “[t]he values included in this column were calculated by taking
15 the total expenditures for the month less amounts paid to California American
16 Water by public and private agencies.”¹⁶⁴ ORA had the expenditures in the form
17 of invoices, but not incoming project funding. To ensure that invoice amounts
18 were offset by incoming funds from outside sources, ORA requested and received
19 from Cal Am the general ledger for the San Clemente Dam Balancing Account.
20 However, in comparing amounts on a monthly basis, none of the amounts could be
21 tied together. See Attachment 6 for a comparison.

22 D.12-06-040 authorized Cal Am to recover \$83 million in construction
23 costs (to be offset by \$34 million in outside funding) plus \$26,802,658 in pre-
24 construction costs for a total of approximately \$76 million to be recovered from
25 ratepayers for removal of the San Clemente Dam. Deducting the \$26,802,658 in

¹⁶³ See the Direct Testimony of Mark Schubert, Attachment 11.

¹⁶⁴ Cal Am’s response to ORA Data Request DG-009 Q.2(a).

1 pre-construction costs previously authorized for recovery from Cal Am's
2 calculated balance of \$92,970,903 yields a total of \$66,168,245 in previously
3 unexamined costs eligible to be challenged in the current proceeding. While the
4 invoices submitted by Cal Am totaling \$70,701,705 exceeds the amount of
5 previously unexamined costs by more than \$4.5 million, it is clear that this is the
6 result of Cal Am including invoices for previously examined and approved costs.
7 Without the ability to discern precisely which invoices included in Cal Am's dump
8 of 2,800 pages of uncategorized invoices correspond to the previously unexamined
9 costs that are now being presented by Cal Am for recovery, ORA examined each
10 of the individual invoices in an effort to detect any amounts that could be
11 individually identified as unreasonable. Although this process identified
12 approximately \$36,000 in unreasonable expenses that should be removed from the
13 balance Cal Am presented for recovery, because of a lack of consistency between
14 Cal Am's reported and supported balances, ORA is only capable of offering the
15 assurance that the total balance presented by Cal Am appears to be less than that
16 authorized in D.12-06-040.

17 **D. Conclusion**

18 If adopted, Cal Am's request will directly result in double-recovery of
19 uncollectible amounts. Thus, the Commission should adjust Cal Am's recoverable
20 amount to exclude uncollectible amounts included in the calculation of monthly
21 amortized costs to be recovered. The result is a reduction in monthly recoverable
22 costs of \$4,248. Removal of \$4,248, at a 12% interest rate, results in a savings of
23 \$4,231,036 over the proposed 20-year project recovery period. Furthermore, the
24 Commission should remove unjust and unreasonable amounts from the balancing
25 account in the amount of \$36,071. The result of these two adjustments results in a
26 monthly expenditure amount of \$750,560.

1 To avoid future occasions where Cal Am creates an inability to reconcile
2 recorded balances with supporting documentation, the Commission should instruct
3 Cal Am to provide sorted and categorized cost documentation that reconciles with
4 recorded account balances and general ledger entries on a monthly basis.

CHAPTER 6: SPECIAL REQUEST #18

A. Introduction

In A.16-07-002, Cal Am makes Special Request #18.¹⁶⁵ Cal Am is seeking a memo account to record costs for complying with the Sustainable Groundwater Management Act (“SGMA”).¹⁶⁶ Richard Svindland’s testimony supports this special request.¹⁶⁷

Cal Am states the adoption of the SGMA requires the designation of groundwater sustainability agencies (GSA) and the adoption of groundwater sustainability plans (GSP) for GSAs designated as medium or high priority by the Department of Water Resources.¹⁶⁸ Cal Am then states that GSAs may have significant power over groundwater users, which could result in additional compliance costs for Cal Am.¹⁶⁹ Further, Cal Am states it may incur additional labor costs to hire additional personnel or to hire consultants to comply with the SGMA obligations.¹⁷⁰

B. Summary of Recommendations

ORA does not oppose Cal Am’s request to establish the account. However, the Commission should require additional reporting requirements before recovery of balances can occur.

¹⁶⁵ A.16-07-002 at p.13.

¹⁶⁶ A.16-07-002 at p.13.

¹⁶⁷ The Direct Testimony of Richard Svindland at pp. 37-41.

¹⁶⁸ The Direct Testimony of Richard Svindland at p.38.

¹⁶⁹ The Direct Testimony of Richard Svindland at pp.38, LL13-21.

¹⁷⁰ The Direct Testimony of Richard Svindland at p.41.

1 C. Discussion

2 The language Cal Am uses to make this special request is very broad. Cal
3 Am states: “In this special request, California American Water is seeking a
4 memorandum account to record costs for complying with the Sustainable
5 Groundwater Management Act.”¹⁷¹ Cal am does not specifically define what
6 compliance costs will be incurred, though Richard Svindland’s testimony does
7 provide some examples. ORA’s concern is that Cal Am will use the broad
8 language of the request to recover costs which may be unrelated to achieving
9 compliance with SGMA.

10 To prevent costs that are not directly incurred for compliance with the
11 SGMA, the Commission should establish more stringent guidelines for costs that
12 may be recorded in the account. More stringent guidelines will also result in
13 reduced review efforts for Commission staff and reduce valuable Commission
14 resources in court if the costs recorded in the account result in significant
15 controversy.

16 The following specific additional requirements should be established and
17 then satisfied before recovery of outstanding balances for this account is approved.
18 In addition to demonstrating that each claimed cost is reasonable and prudent, Cal
19 Am must specifically identify each and every cost, the purpose of each cost, the
20 reason each cost was incurred, and proof each cost was necessary to be in
21 compliance with groundwater sustainability plans adopted by groundwater
22 sustainability agencies. For any existing Cal Am employee who performs work to
23 assist GSAs in development and implementation of groundwater sustainability
24 plans, Cal Am must identify the employee (by employee ID number and position
25 title), show the number of hours the employee worked, the purpose the work was

¹⁷¹ The Direct Testimony of Richard Svindland at p.37.

1 performed, and proof the work was needed to be in compliance with GSA
2 requirements.

3 Cal Am's potential use of the balancing and memo accounts as an avenue
4 to hire additional personnel outside of the General Rate Case is also a concern.
5 New hire costs should only be recorded in the account until the next general rate
6 case where the continued need of the employee will be assessed, and then if found
7 to be reasonable and prudent, forecasted in general rates and excluded from the
8 memo account. Further, any payments received by Cal Am from GSAs, for work
9 performed by Cal Am related to compliance with the SGMA, should represent a
10 reduction to recoverable costs recorded in the account.

11 **D. Conclusion**

12 ORA does not oppose Cal Am's request to establish the account. However,
13 the Commission should adopt additional reporting requirements to ensure that
14 costs recorded in the account are reasonable and prudent before recovery is
15 approved. The additional reporting requirements such as providing proof that costs
16 recorded in the account are necessary to be in compliance with the SGMA and to
17 prove that additional employees hired are needed to achieve compliance with the
18 SGMA will help ensure that Cal Am's ratepayers are not paying for unnecessary
19 costs. These additional reporting requirements will help protect ratepayers from
20 costs that are not reasonable or prudent.

ATTACHMENT 1: BALANCING AND MEMO ACCOUNT TOTALS BY DISTRICT

Row Labels	Sum of Over Collections	Sum of Under Collections	Net Collection by District/Ratemaking Area
▣ All CA	9,263	74,441	65,178
Affiliate Transaction MA	9,263	-	
CEMA	-	-	
Statewide Non Revenue Water Action Plan MA	-	74,441	
Tax Act MA	-	-	
Water-Energy Nexus Program MA	-	-	
▣ Ambler	88,929	739,545	650,616
New LIRA BA	6,968	-	
CACWS	7,161	-	
CEBA	74,800	-	
Old LIRA MA	-	706	
WRAM/MCBA	-	738,839	
▣ Larkfield	132,206	1,581,751	1,449,545
New LIRA BA	4,533	-	
CACWS	3,989	-	
CEBA	-	325,185	
Conservation/Rationing MA	-	128,379	
Old LIRA MA	-	67,218	
OPEB	-	3,586	
Pension BA	123,684	-	
WRAM/MCBA	-	1,057,383	
▣ Los Angeles	676,382	5,955,874	5,279,492
New LIRA BA	-	162,127	
CACWS	-	203,025	
CEBA	-	2,169,450	
Conservation/Rationing MA	-	808,438	
Main San Gabriel MA	-	-	
Old LIRA MA	-	900,522	
OPEB	-	38,448	
Pension BA	676,382	-	
Water Contamination Litigation MA	-	-	
WRAM/MCBA	-	1,673,864	
▣ Monterey	6,753,325	177,102,853	170,349,528
New LIRA BA	276,997	-	
ASR Well 4 MA	-	195,530	
CACWS	-	635,191	
Carmel River Mitigation Program BA	1,082,350	-	
Cease and Desist MA	-	613,607	
CEBA	-	8,300,967	
Conservation/Rationing MA	-	118,240	

CWP BA	1,623,491	-	
CWP MA	-	8,301,809	
Emergency Rationing MA	-	-	
ESA	-	1,223,662	
Garrapata Service Area MA and BA	-	-	
Monterey Leak Adjustment MA	-	3,885,443	
MPWMD Conservation BA	888,209	-	
NOAA/ESA	-	1,551,197	
Old LIRA MA	-	592,062	
Old Monterey WRAM Style BA	-	947,525	
OPEB	-	83,336	
Pension BA	1,735,086	-	
Purchase Power Exp BA	-	108,920	
San Clemente Dam BA	-	92,970,903	
Sand City Desal Plant Purchased Water BA	-	1,347,750	
SDWSRF BA	6,311	-	
Seaside Basin Adjudication BA	-	821,304	
Seaside Basin Adjudication MA	-	-	
Seaside Groundwater Basin BA	1,140,881	-	
WRAM/MCBA	-	55,405,407	
☐ Monterey WW	238,346	62,490	(175,856)
New LIRA BA	23,555	-	
CACWS	31,672	-	
CEBA	-	43,480	
Old LIRA MA	1,771	-	
OPEB	-	19,010	
Pension BA	181,348	-	
☐ Sacramento	2,194,681	26,941,716	24,747,035
New LIRA BA	-	95,862	
CACWS	-	160,184	
CEBA	1,295,969	-	
Conservation/Rationing MA	-	3,134,880	
Dunnigan Closing Cost MA	-	10,584	
Dunnigan Consulting MA	-	75,000	
Dunnigan Environmental Improvement and Compliance Issues	-	35,023	
Old LIRA MA	-	1,341,611	
OPEB	-	45,009	
Pension BA	898,712	-	
Purchased Water, Power and Pump Exp BA	-	195,074	
Sacramento Valley district Conservation or Mandatory Rationing Rev. Adj. Mech. MA	-	4,097,614	
Water Contamination Litigation MA	-	-	
West Placer MA	-	5,307,219	
WRAM/MCBA	-	12,443,656	

San Diego	493,883	2,629,009	2,135,126
New LIRA BA	-	192,945	
CACWS	-	213,975	
CEBA	-	795,711	
Conservation/Rationing MA	-	384,079	
Old LIRA MA	-	476,891	
OPEB	-	14,896	
Pension BA	493,883	-	
WRAM/MCBA	-	550,512	
Toro	35,412	470,738	435,326
New LIRA BA	6,658	-	
CACWS	10,818	-	
CEBA	-	135,947	
Old LIRA MA	-	2,088	
OPEB	-	807	
Pension BA	17,936	-	
WRAM/MCBA	-	331,896	
Ventura	573,972	8,717,615	8,143,643
New LIRA BA	150,435	-	
CACWS	-	112,229	
CEBA	-	1,180,856	
Conservation/Rationing MA	-	468,144	
Old LIRA MA	-	330,702	
OPEB	-	13,174	
Pension BA	423,537	-	
WRAM/MCBA	-	6,612,510	
Grand Total	11,196,399	224,276,032	213,079,633

ATTACHMENT 2: SUMMARY OF REVIEW PROCEDURES AND RECOMMENDED BALANCES FOR BALANCING AND MEMO ACCOUNTS.

WP Ref	Account Name	Basis for Selecting or Not Selecting for Review	Review Methodology	Cal Am Balance	ORA Recommended Balance	Difference
A	CEBA	Less than two years since last Commission review (per Cal Am's response to RK2-001.).	N/A. Account balance has been recently reviewed per Cal Am response to RK2-001 Q(1)(b), attachment "RK2-001 Question 1a". Review of D.15-07-004 and Settlement Agreement.	11,580,827	11,580,827	0
B	NOAA/ESA	Outstanding balance recovered final balance via AL 1133.	Review of account entries provided in Cal Am's Response to RK2-005.2. Review of supporting documentation for three largest account entries provided in Cal Am's Response to ORA Data Request RK2-005.3. Review of Dana Direct Testimony. Review of Cal Am's Preliminary Statement. Review of D.15-07-004 and Settlement Agreement. Review of account balances found to be unnecessary due to authorization of outstanding balance via Advice Letter 1133.	1,551,197	0	1,551,197
C	San Clemente Dam BA	Final balances must be reviewed prior to transfer into base rates.	Review of workpapers (Attachment 2, Jeffrey Dana Direct) for appropriateness of calculations. Review of invoices (Attachment 11, Mark Schubert Direct). Read D.12-06-040. Read Application. Read Dana Direct. Read Schubert Direct. Review of Cal Am's Responses to Data Request DG-005 and DG-009.	92,970,903	92,934,832	36,071
D	WRAM/MCBA	Account reviewed annually outside of GRC.	N/A. Review of account balances unnecessary due to required Annual Filings per D.12-04-048.	78,814,067	78,814,067	0
E	ESA	No Commission review since last GRC as of 5/31/13.	Review of ledger entries provided in Cal Am's Response to ORA Data Request RK2-005.2. Review of supporting documentation for sample of three largest account entries provided in Cal Am's Response to ORA Data Request RK2-005.3. Review of Cal Am Response to ORA Data Request RK4-004 Q.1(a)(i). Review of D.15-07-004 and Settlement Agreement. Review of Cal Am's Preliminary Statement. Review of Dana Direct Testimony.	1,223,662	333,865	889,797

F	MPWMD Conservation BA	No Commission review since last GRC as of 5/31/13.	Judgement sample of three largest "Conservation Expense" entries comprising \$641,093 and review of supporting documentation.	-888,209	-888,121	-88
G	Old LIRA MA	Balance is for the period not reviewed in the last GRC (June 2013 to December 31, 2014).	Review general ledger for account entries that look to be anomalous (greater than 20% from typical account entry.) Review of supporting documentation for single account entry provided in Cal Am's Response to ORA Data Request RK2-005.3. Review of Dana Direct Testimony. Review of Cal Am's Preliminary Statement. Review of D.15-07-004 and Settlement Agreement.	3,710,029	3,710,029	0
H	New LIRA BA	New account. Has not been previously subjected to reasonableness review.	Review of ledger entries provided in Cal Am's Response to ORA Data Request RK2-005.2. Review general ledger for account entries that look to be anomalous (greater than 20% from average account entry.) Review of supporting documentation for single account entry provided in Cal Am's Response to ORA Data Request RK2-005.3. Review of Dana Direct Testimony. Review of Cal Am's Preliminary Statement. Review of D.15-07-004 and Settlement Agreement.	-18,212	-18,212	0
I	CACWS	Funding authorized in previous GRC not spent.	Detail review of program spending breakdown provided by Patrick Pilz Direct Testimony, and in Cal Am's 2015 Annual Report. Review of ledger entries provided in Cal Am's Response to ORA Data Request RK2-005.2. Review of supporting documentation for five largest account entries provided in Cal Am's Response to ORA Data Request RK2-005.3. Review of Cal Am's Response to ORA Data Request RK2- 005.4. Review of Cal Am's Response to ORA Data Request RK2-005.6. Review of Dana Direct Testimony. Review of Cal Am's Preliminary Statement. Review of D.15-07-004 and Settlement Agreement.	1,270,964	1,213,857	57,107
J	CWP MA	Account to be reviewed in separate proceedings. Per D.12-07- 008.	Cal Am has indicated that this account will be reviewed via a separate proceeding. Review of Cal Am's Preliminary Statement. Review of D.15-07-004 and Settlement Agreement. Review of D11-03-049. Review of D.10-08-008. Review of D.06-12-040. Review of Dana Direct Testimony. Review of Cal Am's Preliminary Statement.	8,301,809	8,301,809	0
K	CWP BA	Account is in an over- recovered position.	Review of detailed workpapers provided in response to RK2-005.2. Review of Dana Direct Testimony. Review of Cal Am's Preliminary Statement. Review of D.15-07-004 and Settlement Agreement.	-1,623,491	-1,623,491	0
L	Water Contamination Litigation MA	Zero balance. 100% decrease from 2015 Annual Report.	No balance to review. Review of Dana Direct Testimony. Review of Cal Am's Preliminary Statement. Review of D.15-07-004 and Settlement Agreement.	0	0	0
M	CEMA	Zero balance.	No balance to review. Review of Dana Direct Testimony. Review of Cal Am's Preliminary Statement. Review of D.15-07-004 and Settlement Agreement.	0	0	0

N	Seaside Basin Adjudication BA	No Commission review since last GRC as of 5/31/13.	No new expenses recorded in account. Review of ledger entries provided in Cal Am's Response to ORA Data Request RK2-005.2. Review of supporting documentation for three largest account entries provided in Cal Am's Response to ORA Data Request RK2-005.3. Review of Dana Direct Testimony. Review of Cal Am's Preliminary Statement. Review of D.15-07-004 and Settlement Agreement.	821,304	821,304	0
O	Seaside Groundwater Basin MA	Zero balance.	No balance to review. Review of Dana Direct Testimony. Review of Cal Am's Preliminary Statement. Review of D.15-07-004 and Settlement Agreement.	0	0	0
P	Seaside Groundwater Basin BA	Account is substantially over- collected. Will be forecasted in rates going forward.	Review of ledger entries provided in Cal Am's Response to ORA Data Request RK2-005.2. Review of supporting documentation for single account entry provided in Cal Am's Response to ORA Data Request RK2-005.3. Review of Dana Direct Testimony. Review of Cal Am's Preliminary Statement. Review of D.15-07-004 and Settlement Agreement.	-1,140,881	-1,269,116	128,235
Q	Carmel River Mitigation Program BA	No Commission review since last GRC as of 5/31/13. Account substantially over- collected.	Review of ledger entries provided in Cal Am's Response to ORA Data Request RK2-005.2. Review of supporting documentation for five largest account entries provided in Cal Am's Response to ORA Data Request RK2-005.3. Review of Dana Direct Testimony. Review of Cal Am's Preliminary Statement. Review of D.15-07-004 and Settlement Agreement.	-1,082,350	-1,082,350	0
R	Pension BA	No Commission review since last GRC as of 5/31/13.	Review of ledger entries provided in Cal Am's Response to ORA Data Request RK2-005.2. Judgment Sample consisting of two entries from each district. Review of supporting documentation for account entries provided in Cal Am's Response to ORA Data Request RK2-005.3. Review of Dana Direct Testimony. Review of Cal Am's Preliminary Statement. Review of D.15-07-004 and Settlement Agreement.	-4,550,568	-4,550,568	0
S	OPEB BA	No Commission review since last GRC as of 5/31/13.	Review of ledger entries provided in Cal Am's Response to ORA Data Request RK2-005.2. Judgment Sample consisting of two entries from each district. Review of supporting documentation for account entries provided in Cal Am's Response to ORA Data Request RK2-005.3. Review of Dana Direct Testimony. Review of Cal Am's Preliminary Statement. Review of D.15-07-004 and Settlement Agreement.	218,266	218,266	0
T	Old Monterey WRAM Style BA	Residual balance previously subject to reasonableness and prudence review.	No new costs recorded in account. Amounts have previously been found reasonable and prudent. Remaining balances are the residual balances after expiration if Advice Letter 987. Review of ledger entries provided in Cal Am's Response to ORA Data Request RK2-005.2 for inappropriate entries. Review of Dana Direct Testimony. Review of Cal Am's Preliminary Statement. Review of D.15-07-004 and Settlement Agreement.	947,525	947,525	0

U	Emergency Rationing MA	Zero balance.	No balance to review. Review of Dana Direct Testimony. Review of Cal Am's Preliminary Statement. Review of D.15-07-004 and Settlement Agreement.	0	0	0
V	Purchased Water, Power and Pump Exp BA	No Commission review since last GRC as of 5/31/13.	Review of ledger entries provided in Cal Am's Response to ORA Data Request RK2-005.2. Review of supporting documentation for largest account entry provided in Cal Am's Response to ORA Data Request RK2-005.3. for appropriateness of calculations. Review of Dana Direct Testimony. Review of Cal Am's Preliminary Statement. Review of D.15-07-004 and Settlement Agreement.	195,074	195,074	0
W	Purchase Power Exp BA	No Commission review since last GRC as of 5/31/13.	Review of ledger entries provided in Cal Am's Response to ORA Data Request RK2-005.2. Review of supporting documentation for largest account entry provided in Cal Am's Response to ORA Data Request RK2-005.3. for appropriateness of calculations. Review of Dana Direct Testimony. Review of Cal Am's Preliminary Statement. Review of D.15-07-004 and Settlement Agreement.	108,920	108,920	0
X	Cease and Desist MA	No Commission review since last GRC as of 5/31/13.	Review of ledger entries provided in Cal Am's Response to ORA Data Request RK2-005.2. Review of supporting documentation for the top 10% largest legal invoices provided in Cal Am's Response to ORA Data Request RK2-005.3. Review of Dana Direct Testimony. Review of Cal Am's Preliminary Statement. Review of D.15-07-004 and Settlement Agreement.	613,607	580,571	33,036
Y	Affiliate Transaction MA	Balance is immaterial and in an over collected position.	No review of balance. Review of Dana Direct Testimony. Review of Cal Am's Preliminary Statement. Review of D.15-07-004 and Settlement Agreement.	-9,263	-9,263	0
Z	Main San Gabriel MA	Zero balance.	No balance to review. Review of Dana Direct Testimony. Review of Cal Am's Preliminary Statement. Review of D.15-07-004 and Settlement Agreement.	0	0	0
AA	ASR Well 4 MA	Amounts not previously reviewed.	Examine authorizing advice letter (AL and supporting revenue requirement workpaper calculations.	195,530	195,530	0
BB	Statewide Non Revenue Water Action Plan MA	Amounts not previously reviewed.	Review of ledger entries provided in Cal Am's Response to ORA Data Request RK2-005.2. Review of supporting documentation for largest single account entry provided in Cal Am's Response to ORA Data Request RK2-005.3.Examine largest account entry and supporting documentation.	74,441	74,441	0
CC	Monterey Leak Adjustment MA	Cal Am not requesting review of balance.	No review of balance. No assessment of reasonableness or prudence. Review of Dana Direct Testimony. Review of Cal Am's Preliminary Statement. Review of D.15-07-004 and Settlement Agreement.	3,885,443	3,885,443	0
DD	Sand City Desal Plant Purchased Water BA	Project reviewed by other ORA witness as part of Cal Am's	See ORA Chapter Special Request #4.	1,347,750	1,347,750	0

EE	Conservation/Rationing MA	Amounts not previously reviewed.	Review of ledger entries provided in Cal Am's Response to ORA Data Request RK2-005.2. Examine three largest entries totaling \$547,067 and supporting documentation provided in Cal Am's Response to ORA Data Request RK2-005.3. Review of Dana Direct Testimony. Review of Cal Am's Preliminary Statement. Review of D.15-07-004 and Settlement Agreement.	2,325,064	2,325,064	0
FF	Chromium 6 MA	No Commission review since last GRC as of 5/31/13.	Review of ledger entries provided in Cal Am's Response to ORA Data Request RK2-005.2. Examine 3 largest Account entries and supporting Documentation provided in Cal Am's Response to ORA Data Request RK2-005.3. Review of Dana Direct Testimony. Review of Cal Am's Preliminary Statement. Review of D.15-07-004 and Settlement Agreement.	2,717,096	2,717,096	0
GG	Garrapata Service Area MA and BA	Zero balance.	No balance to verify. Review of Dana Direct Testimony. Review of Cal Am's Preliminary Statement.	0	0	0
HH	SDWSRF BA	No Commission review since last GRC as of 5/31/13.	Review of Commission Resolution W-4788. Review of Dana Direct Testimony. Review of Cal Am's Preliminary Statement. Review of D.15-07-004 and Settlement Agreement.	-6,311	-6,311	0
II	Tax Act MA	Zero balance necessitates review.	Review of workpapers to ensure account balances are calculated in accordance with L-411A. Review of Commission Resolution L-411A. Review of Cal Am's Response to ORA Data Request MC8-005. Review of Cal Am's Response to ORA Data Request MC8-009. Review of Dana Direct Testimony. Review of Cal Am's Preliminary Statement. Review of D.15-07-004 and Settlement Agreement.	0	0	0
JJ	West Placer MA	Cal Am did not request review of the account.	No review of account balances. Review of D.13-10-003. Review of Dana Direct Testimony. Review of Cal Am's Preliminary Statement.	5,307,219	5,307,219	0
KK	Sacramento Valley District Conservation or Mandatory Rationing Rev. Adj. Mech. MA	Balance authorized for recovery via AL-1102 and Commission Res W-5099. 23% increase from 2015 Annual Report.	No review of account balance. Account has been authorized for recovery (transfer to CEBA) via Res W-5099 (initiated by AL-1102 and AL 1102-A) effective 6/28/16, so balance is a non-issue. Review of Dana Direct Testimony. Review of Cal Am's Preliminary Statement. Review of D.15-07-004 and Settlement Agreement. Review of Commission Resolution W-4976. Review of Advice Letter 1102-A. Review of Advice Letter 1038. Review of Advice Letter 1072-B.	4,097,614	0	4,097,614
LL	Dunnigan Environmental Improvement and Compliance Issues MA	New account. Has not been previously subjected to reasonableness review.	Review of ledger entries provided in Cal Am's Response to ORA Data Request RK2-005.2. Review of supporting documentation for two largest account entries (judgment sample) provided in Cal Am's Response to ORA Data Request RK2-005.3. Review of Dana Direct Testimony. Review of Cal Am's Preliminary Statement.	35,023	35,023	0

MM	Dunnigan Consulting MA	New account. Has not been previously subjected to reasonableness review.	Review of ledger entries provided in Cal Am's Response to ORA Data Request RK2-005.2. Review of supporting documentation for single account entry provided in Cal Am's Response to ORA Data Request RK2-005.3. Review of Dana Direct Testimony.	75,000	75,000	0
NN	Dunnigan Closing Cost MA	New account. Has not been previously subjected to reasonableness review.	Review of ledger entries provided in Cal Am's Response to ORA Data Request RK2-005.2. Review of supporting documentation for single account entry provided in Cal Am's Response to ORA Data Request RK2-005.3. Review of Dana Direct Testimony.	10,584	10,584	0
OO	Water-Energy Nexus Program MA	Zero balance.	No balance to review. Review of Dana Direct Testimony. Review of Cal Am's Preliminary Statement.	0	0	0
Total				213,079,633	206,286,664	6,792,969

**ATTACHMENT 3: PROPOSED 3-YEAR TOTAL CONSERVATION
PROGRAM BUDGET 2018-2020.**

San Diego				
BMP	Program	Cal Am's Proposed	ORA's Recommended	Difference
1.1	Conservation Staff	\$ -	\$ -	\$ -
2.1	Public Information Programs	\$ 36,000	\$ 36,000	\$ -
2.2	School Education Programs	\$ 68,000	\$ 47,000	\$ 21,000
3	Residential Water Surveys	\$ 15,000	\$ 15,000	\$ -
3	Residential Plumbing Retrofit	\$ 12,000	\$ -	\$ 12,000
3	Washing Machine Rebates	\$ -	\$ -	\$ -
3	Toilet/Ultra-Low Flow Toilet Program	\$ -	\$ -	\$ -
3	HET Direct Installation - Low Income	\$ -	\$ -	\$ -
3	Water/Energy Direct Installations - Low Income	\$ 50,000	\$ 50,000	\$ -
4	CII and LL Surveys	\$ 75,000	\$ 60,000	\$ 15,000
4	CII Rebates	\$ -	\$ -	\$ -
3 & 5	Turf Removal Rebate	\$ -	\$ -	\$ -
5	Landscape Upgrade Grant Program	\$ -	\$ -	\$ -
Total		\$ 256,000	\$ 208,000	\$ 48,000

Ventura				
BMP	Program	Cal Am's Proposed	ORA's Recommended	Difference
1.1	Conservation Staff	\$ -	\$ -	\$ -
2.1	Public Information Programs	\$ 70,000	\$ 70,000	\$ -
2.1	WaterSmart Software or Similar		\$ -	\$ -
2.2	School Education Programs	\$ 60,000	\$ 51,000	\$ 9,000
3	Residential Water Surveys	\$ 30,000	\$ 30,000	\$ -
3	Residential Plumbing Retrofit	\$ 12,000	\$ 12,000	\$ -
3	Washing Machine Rebates	\$ -	\$ -	\$ -
3	Toilet/Ultra-Low Flow Toilet Program	\$ -	\$ -	\$ -
3	HET Direct Installation - Low Income	\$ -	\$ -	\$ -
3	Water/Energy Direct Installations - Low Income	\$ 65,000	\$ 65,000	\$ -
4	CII and LL Surveys	\$ 10,000	\$ -	\$ 10,000
4	CII Rebates	\$ 110,000	\$ 110,000	\$ -
3 & 5	Turf Removal Rebate	\$ -	\$ -	\$ -
5	Landscape Upgrade Grant Program	\$ 75,000	\$ 25,000	\$ 50,000
Total		\$ 432,000	\$ 363,000	\$ 69,000

Monterey County excl MPWMD				
BMP	Program	Cal Am's Proposed	ORA's Recommended	Difference
1.1	Conservation Staff	\$ -	\$ -	\$ -
	Conservation Workshops & Training	\$ 20,000	\$ 20,000	\$ -
2.1	Public Information Programs	\$ 300,000	\$ 300,000	\$ -
2.2	School Education Programs	\$ 15,000	\$ 15,000	\$ -
3	Residential Water Surveys	\$ 25,000	\$ 25,000	\$ -
3	Residential Plumbing Retrofit	\$ 43,500	\$ 43,500	\$ -
3,4,5	Rebats(CII, LL, Residential Toilet & Clothes Washer	\$ 1,600,000	\$ 1,600,000	\$ -
4	CII and LL Sureveys	\$ 150,000	\$ 104,000	\$ 46,000
3 & 5	WBIC Piolet Study Project	\$ -		\$ -
3 & 5	Soil Moisture and Rain Sensor Program	\$ 25,000	\$ 25,000	\$ -
5	Large Landscape Upgrade Grant Program	\$ 45,000	\$ 45,000	\$ -
3	HET Direct Installations - Low Income	\$ -		\$ -
	Water/ Energy Nexus	\$ 75,000	\$ 75,000	\$ -
Total		\$ 2,298,500	\$ 2,252,500	\$ 46,000

Sacramento District				
BMP	Program	Cal Am's Proposed	ORA's Recommended	Difference
1.1	Conservation Staff	\$ -	\$ -	\$ -
2.1	Public Information Programs	\$ 140,000	\$ 140,000	\$ -
2.2	School Education Programs	\$ 125,000	\$ 21,000	\$ 104,000
3	Residential Water Surveys	\$ 60,000	\$ 48,000	\$ 12,000
3	Residential Plumbing Retrofit	\$ 25,000	\$ 25,000	\$ -
3	Residential HECW Rebates	\$ -	\$ -	\$ -
3	Residential Toilet Rebates	\$ -	\$ -	\$ -
3	HET Direct Installation - Low Income	\$ -	\$ -	\$ -
3	Water/Energy Direct Installations - Low Income	\$ 135,000	\$ 7,500	\$ 127,500
4	CII Rebates	\$ 20,000	\$ 1,500	\$ 18,500
3 & 5	Turf Removal Rebate	\$ -	\$ -	\$ -
5 & 4	CII and LL Surveys	\$ 270,000	\$ 234,000	\$ 36,000
				\$ -
Total		\$ 775,000	\$ 477,000	\$ 298,000

Larkfield District				
BMP	Program	Cal Am's Proposed	ORA's Recommended	Difference
1.1	Conservation Staff	\$ 25,000	\$ 25,000	\$ -
2.1	Public Information Programs	\$ 10,000	\$ 2,600	\$ 7,400
2.2	School Education Programs	\$ 2,500	\$ -	\$ 2,500
3	Residential Water Surveys	\$ 10,000	\$ 1,000	\$ 9,000
3	Residential Plumbing Retrofit	\$ 4,500	\$ 4,500	\$ -
3	Wahing Machine Rebates	\$ -	\$ -	\$ -
3	Residential Toilet Rebates	\$ -	\$ -	\$ -
4	CII Rebates	\$ -	\$ -	\$ -
5 & 4	CII and LL Surveys	\$ 7,500	\$ -	\$ 7,500
				\$ -
Total		\$ 59,500	\$ 33,100	\$ 26,400

**ATTACHMENT 4: ADJUSTMENTS TO CAL AM'S SAN CLEMENTE DAM
BALANCING ACCOUNT.**

PDF Page No.	Invoice No.	Invoice date	Vendor name	Cal Am Amount [\$]	ORA Amount
87	474101-024	41,864	Allen Matkins	13,175	-
88	474855-024	41,886	Allen Matkins	16,770	-
314	204338	42,250	bna communications	16,297	10,557
1,634	15-315	42,269	Ventura Consulting Group	7,519	7,133
Total				53,761	17,690

ATTACHMENT 5: SAN CLEMENTE DAM ADJUSTED AMORTIZATION SCHEDULE.

Attachment 5 - San Clemente Dam Summary													
Period	Beginning Balance for SCD, net of amortization (recovery)	Deferred tax liability	SCD, net of DTL	Multiplied by Monthly COC	Equals COC	Recovery billed during the month	Less Uncollectible Accounts	Equals Recovery Collected	Collected to recover COC	Amount to recognize as amortization	Net increase to Reg Asset, Surcharges less than AFUDC calc	Additional Expenditures during the month	Ending Balance for SCD
Jun-12										Pre-Construction Costs per D12.06-040 Authorized Interest as of Dec. 31, 2011 per D12.06-040 Authorized Cost of Capital from 1/1/12 to 6/30/12 Construction Costs			21,724,907 2,577,751 1,091,848 3,379,194 358,684
Jul-12	29,132,384	-	29,132,384	1.0042%	292,547	-	-	-	-	-	-	(554,637)	28,870,295
Aug-12	28,870,295	-	28,870,295	1.0042%	288,915	-	-	-	-	-	-	51,014	29,211,223
Sep-12	29,211,223	-	29,211,223	1.0042%	293,339	-	-	-	-	-	-	969,337	30,473,900
Oct-12	30,473,900	-	30,473,900	1.0042%	306,019	340,198	1,914	338,284	306,019	32,265	-	805,587.02	31,247,221
Nov-12	31,247,221	-	31,247,221	1.0042%	313,785	342,063	1,924	340,139	313,785	26,354	-	107,914.34	31,328,782
Dec-12	31,328,782	-	31,328,782	1.0042%	314,604	216,889	1,220	215,669	215,669	-	-	98,935	31,305,523
Jan-13	31,305,523	-	31,305,523	1.0042%	314,370	176,601	983	175,608	175,608	-	-	138,762	31,142,898
Feb-13	31,142,898	-	31,142,898	1.0042%	312,737	199,181	1,120	198,060	198,060	-	-	114,677	31,355,908
Mar-13	31,355,908	-	31,355,908	1.0042%	314,876	202,036	1,136	200,900	200,900	-	-	113,976	31,890,836
Apr-13	31,890,836	-	31,890,836	1.0042%	320,248	232,299	1,307	230,992	230,992	-	-	89,266	32,136,317
May-13	32,136,317	-	32,136,317	1.0042%	322,713	397,816	2,238	395,578	322,713	72,865	-	246,911.53	32,310,364
Jun-13	32,310,364	-	32,310,364	1.0042%	324,461	420,178	2,364	417,815	324,461	93,354	-	1,771,947.48	33,988,958
Jul-13	33,988,958	-	33,988,958	1.0042%	341,317	378,693	2,130	376,563	341,317	35,246	-	595,102.60	34,548,814
Aug-13	34,548,814	-	34,548,814	1.0042%	346,939	422,788	2,378	420,410	346,939	73,471	-	2,807,260.07	37,282,603
Sep-13	37,282,603	-	37,282,603	1.0042%	374,392	409,870	2,306	407,565	374,392	33,173	-	1,769,304.58	39,018,735
Oct-13	39,018,735	-	39,018,735	1.0042%	391,826	252,546	1,421	251,125	251,125	-	-	5,321,118.30	44,480,554
Nov-13	44,480,554	-	44,480,554	1.0042%	446,674	384,158	2,161	381,997	381,997	-	-	64,677	45,484,586
Dec-13	45,484,586	-	45,484,586	1.0042%	456,756	311,965	1,755	310,210	310,210	-	-	146,546	44,263,086
Jan-14	44,263,086	-	44,263,086	1.0042%	444,490	507,832	2,857	504,975	444,490	60,485	-	425,935.14	45,111,405
Feb-14	44,628,536	-	44,628,536	1.0042%	448,160	422,119	2,374	419,745	419,745	-	-	28,415	45,453,535
Mar-14	45,111,405	-	45,111,405	1.0042%	453,009	245,629	1,381	244,148	244,148	-	-	208,861	47,399,824
Apr-14	45,767,196	-	45,767,196	1.0042%	459,594	293,438	1,369	292,069	292,069	-	-	217,525	48,386,545
May-14	47,399,824	-	47,399,824	1.0042%	475,989	391,311	2,201	389,110	389,110	-	-	86,679	48,890,039
Jun-14	48,386,545	3,689,444	44,697,101	1.0042%	448,848	521,381	2,933	518,448	448,848	69,600	-	573,094.11	52,167,894
Jul-14	48,890,039	3,363,894	45,526,145	1.0042%	457,174	390,012	2,194	387,818	387,818	-	-	69,356	53,202,489.34
Aug-14	52,167,894	3,363,894	48,803,989	1.0042%	490,090	467,407	2,629	464,778	464,778	-	-	25,312	57,545,895
Sep-14	57,545,895	3,363,894	54,182,000	1.0042%	544,096	419,427	2,359	417,068	417,068	-	-	127,028	61,890,248
Oct-14	61,890,248	3,038,345	58,821,904	1.0042%	590,690	379,623	2,135	377,487	377,487	-	-	213,203	69,161,640
Nov-14	69,161,640	6,114,574	63,047,067	1.0042%	633,119	296,704	1,669	295,035	295,035	-	-	338,094	70,885,336
Dec-14	70,885,336	6,114,574	64,770,762	1.0042%	650,428	271,386	1,527	269,869	269,869	-	-	380,559	71,890,785
Jan-15	71,890,785	6,082,118	66,447,928	1.0042%	660,650	200,032	1,125	198,907	198,907	-	-	461,743	72,510,046
Feb-15	72,510,046	6,082,118	66,447,928	1.0042%	667,270	281,898	1,566	280,312	280,312	-	-	386,958	69,303,897
Mar-15	69,303,897	6,082,118	63,241,770	1.0042%	635,074	324,381	1,825	322,556	322,556	-	-	312,518	67,673,480
Apr-15	67,673,480	6,009,661	61,663,819	1.0042%	619,228	292,690	1,590	291,100	291,100	-	-	338,728	67,928,627
May-15	67,928,627	6,009,661	61,919,166	1.0042%	621,792	303,368	1,707	301,691	301,691	-	-	320,101	69,569,086
Jun-15	69,569,086	8,128,737	61,440,349	1.0042%	616,984	359,801	2,024	357,777	357,777	-	-	259,207	70,890,826
Jul-15	70,890,826	8,076,281	62,814,545	1.0042%	630,784	415,512	2,337	413,175	413,175	-	-	217,609	72,011,337
Aug-15	72,011,337	8,076,281	63,935,056	1.0042%	642,036	423,600	2,383	421,217	421,217	-	-	220,819	74,923,011

Sep-15	74,923,011	14,056,388	60,866,623	1,0042%	611,223	401,557	2,259	399,298	399,298	-	211,925	1,941,829	77,076,765
Oct-15	77,076,765	14,003,932	63,072,833	1,0042%	633,377	320,016	1,800	318,216	318,216	-	315,161	2,836,974	80,228,899
Nov-15	80,228,899	14,003,932	66,224,968	1,0042%	666,031	329,737	1,855	327,882	327,882	-	337,149	2,850,629	83,416,677
Dec-15	83,416,677	21,286,635	62,150,042	1,0042%	624,111	252,066	1,418	250,648	250,648	-	373,463	5,186,572	88,976,712
Jan-16	88,976,712	21,286,635	67,710,077	1,0042%	678,945	204,719	1,152	203,567	203,567	-	476,378	(8,006)	90,156,171
Feb-16	89,445,084	21,286,635	68,178,449	1,0042%	684,648	213,170	1,199	211,971	211,971	-	472,677	238,410	91,181,289
Mar-16	90,156,171	21,286,635	68,889,537	1,0042%	691,789	242,201	1,362	240,839	240,839	-	450,950	(3,484,777)	92,087,159
Apr-16	87,122,345	22,561,045	64,561,300	1,0042%	684,325	239,784	1,349	238,435	238,435	-	409,890	405,034	93,259,019
May-16	87,937,288	22,561,045	65,376,224	1,0042%	656,508	307,711	1,731	305,980	305,980	-	350,528	(2,293,185)	94,221,017
Jun-16	85,994,611	22,561,045	63,433,566	1,0042%	637,000	359,801		357,777	357,777	-	279,223	(500,000)	95,259,019
Jul-16	85,773,834	22,561,045	63,212,789	1,0042%	634,783	415,512	2,337	413,175	413,175	-	221,608		
Aug-16	86,995,442	27,085,019	58,910,423	1,0042%	591,578	423,600	2,383	421,217	421,217	-	170,361		
Sep-16	86,165,803	27,085,019	59,080,784	1,0042%	593,289	401,567	2,259	399,298	399,298	-	193,991		
Oct-16	86,359,793	27,085,019	59,274,775	1,0042%	596,237	320,016	1,800	318,216	318,216	-	277,021	6,000,000	96,359,793
Nov-16	92,636,814	27,085,019	65,551,796	1,0042%	658,271	329,737	1,855	327,882	327,882	-	330,389		
Dec-16	92,967,203	27,085,019	65,882,184	1,0042%	661,589	252,066	1,418	250,648	250,648	-	410,941	(119,125)	97,937,288
Jan-17	93,259,019	27,085,019	66,174,001	1,0042%	664,519	204,719	1,152	203,567	203,567	-	460,952	(1,936,684)	98,221,017
Feb-17	91,783,287	27,085,019	64,698,269	1,0042%	649,700	213,170	1,199	211,971	211,971	-	437,729	(3,000,000)	99,038,739
Mar-17	89,221,017	27,085,019	62,135,998	1,0042%	623,970	242,201	1,362	240,838	240,838	-	383,132	87,000	99,949,872
Apr-17	89,691,148	27,085,019	62,606,130	1,0042%	628,691	282,690	1,590	281,100	281,100	-	347,591		
May-17	90,038,739	27,085,019	62,953,721	1,0042%	632,181	303,388	1,707	301,691	301,691	-	330,490		
Jun-17	90,369,229	27,583,783	62,785,446	1,0042%	630,491	359,801	2,024	357,777	357,777	-	272,714	87,000	99,728,943
Jul-17	90,728,943	27,583,783	63,145,160	1,0042%	634,104	415,512	2,337	413,175	413,175	-	220,929		
Aug-17	90,949,872	27,583,783	63,366,090	1,0042%	638,322	423,600	2,383	421,217	421,217	-	215,105		
Sep-17	91,164,977	27,583,783	63,581,194	1,0042%	638,482	401,567	2,259	399,298	399,298	-	239,184	87,000	99,491,161
Oct-17	91,491,161	27,583,783	63,807,378	1,0042%	641,758	320,016	1,800	318,216	318,216	-	323,542		
Nov-17	91,814,703	27,583,783	64,230,920	1,0042%	645,007	329,737	1,855	327,882	327,882	-	317,125		
Dec-17	92,131,827	27,583,783	64,548,045	1,0042%	648,191	252,066	1,418	250,648	250,648	-	397,543	87,000	99,616,371
Jan-18	92,482,833	27,544,054	65,036,245	1,0042%	653,094	750,560,50	-	750,560	653,094	97,466	-		
Feb-18	92,482,833	27,504,090	64,978,743	1,0042%	652,517	750,560	-	750,560	652,517	98,043	-		
Mar-18	92,384,790	27,463,889	64,920,900	1,0042%	651,936	750,560	-	750,560	651,936	98,624	-		
Apr-18	92,286,165	27,423,450	64,862,715	1,0042%	651,351	750,560	-	750,560	651,351	99,209	-		
May-18	92,186,956	27,382,771	64,804,184	1,0042%	650,784	750,560	-	750,560	650,784	99,796	-		
Jun-18	92,087,159	28,389,307	63,697,852	1,0042%	638,654	750,560	-	750,560	639,654	110,906	-		
Jul-18	91,976,253	28,343,834	63,632,419	1,0042%	638,997	750,560	-	750,560	638,997	111,563	-		
Aug-18	91,864,689	28,298,091	63,566,598	1,0042%	638,336	750,560	-	750,560	638,336	112,224	-		
Sep-18	91,752,465	28,282,077	63,500,388	1,0042%	637,671	750,560	-	750,560	637,671	112,889	-		
Oct-18	91,639,575	28,205,790	63,433,785	1,0042%	637,002	750,560	-	750,560	637,002	113,558	-		
Nov-18	91,526,017	28,159,229	63,366,787	1,0042%	636,329	750,560	-	750,560	636,329	114,231	-		
Dec-18	91,411,785	28,112,392	63,299,393	1,0042%	635,653	750,560	-	750,560	635,653	114,907	-		
Jan-19	91,296,878	28,065,278	63,231,600	1,0042%	634,972	750,560	-	750,560	634,972	115,588	-		
Feb-19	91,181,289	28,017,884	63,163,405	1,0042%	634,287	750,560	-	750,560	634,287	116,273	-		
Mar-19	91,065,016	27,970,210	63,094,806	1,0042%	633,598	750,560	-	750,560	633,598	116,962	-		
Apr-19	90,948,053	27,922,252	63,025,801	1,0042%	632,905	750,560	-	750,560	632,905	117,655	-		
May-19	90,830,398	27,874,011	62,956,386	1,0042%	632,208	750,560	-	750,560	632,208	118,352	-		
Jun-19	90,712,045	29,153,701	61,558,344	1,0042%	618,169	750,560	-	750,560	618,169	132,391	-		
Jul-19	90,579,654	29,099,419	61,480,234	1,0042%	617,385	750,560	-	750,560	617,385	133,175	-		
Aug-19	90,446,478	29,044,816	61,401,662	1,0042%	616,595	750,560	-	750,560	616,595	133,965	-		
													90,312,513

Sep-19	90,312,513	28,989,889	61,322,623	1,0042%	615,802	750,560	-	750,560	615,802	134,758	-	
Oct-19	90,177,754	28,994,637	61,243,117	1,0042%	615,003		-	750,560	615,003	135,557	-	90,177,754
Nov-19	90,042,197	28,879,057	61,163,139	1,0042%	614,200	750,560	-	750,560	614,200	136,360	-	90,042,197
Dec-19	89,905,836	28,823,148	61,082,688	1,0042%	613,392	750,560	-	750,560	613,392	137,168	-	89,905,836
Jan-20	89,768,688	28,766,908	61,001,760	1,0042%	612,580	750,560	-	750,560	612,580	137,980	-	89,768,688
Feb-20	89,630,687	28,710,334	60,920,353	1,0042%	611,762	750,560	-	750,560	611,762	138,798	-	89,630,687
Mar-20	89,491,889	28,653,425	60,838,464	1,0042%	610,940	750,560	-	750,560	610,940	139,620	-	89,352,268
Apr-20	89,352,268	28,596,179	60,756,089	1,0042%	610,113	750,560	-	750,560	610,113	140,447	-	89,211,821
May-20	89,211,821	28,538,583	60,673,227	1,0042%	609,281	750,560	-	750,560	609,281	141,279	-	89,070,541
Jun-20	89,070,541	31,169,496	57,901,045	1,0042%	581,442	750,560	-	750,560	581,442	169,118	-	88,901,423
Jul-20	88,901,423	31,100,159	57,801,264	1,0042%	580,440	750,560	-	750,560	580,440	170,120	-	88,731,302
Aug-20	88,731,302	31,030,411	57,700,892	1,0042%	579,432	750,560	-	750,560	579,432	171,128	-	88,560,174
Sep-20	88,560,174	30,960,249	57,599,924	1,0042%	578,418	750,560	-	750,560	578,418	172,142	-	88,388,031
Oct-20	88,388,031	30,889,672	57,498,359	1,0042%	577,399	750,560	-	750,560	577,399	173,161	-	88,214,870
Nov-20	88,214,870	30,818,677	57,396,193	1,0042%	576,373	750,560	-	750,560	576,373	174,187	-	88,040,682
Dec-20	88,040,682	30,747,281	57,293,421	1,0042%	575,341	750,560	-	750,560	575,341	175,219	-	(1,324,245)
Jan-21	86,541,218	30,670,025	55,871,192	1,0042%	561,059	750,560	-	750,560	561,059	189,501	-	86,351,716
Feb-21	86,351,716	30,592,332	55,759,384	1,0042%	559,936	750,560	-	750,560	559,936	190,624	-	86,161,092
Mar-21	86,161,092	30,514,178	55,646,913	1,0042%	558,806	750,560	-	750,560	558,806	191,754	-	85,969,337
Apr-21	85,969,337	30,435,562	55,533,776	1,0042%	557,670	750,560	-	750,560	557,670	192,890	-	85,776,447
May-21	85,776,447	30,356,479	55,419,968	1,0042%	556,527	750,560	-	750,560	556,527	194,033	-	85,582,413
Jun-21	85,582,413	32,836,468	52,745,945	1,0042%	529,675	750,560	-	750,560	529,675	220,885	-	85,361,528
Jul-21	85,361,528	32,666,797	52,694,731	1,0042%	529,160	750,560	-	750,560	529,160	221,400	-	85,140,127
Aug-21	85,140,127	32,581,339	52,558,789	1,0042%	527,795	750,560	-	750,560	527,795	222,765	-	84,917,362
Sep-21	84,917,362	32,485,353	52,422,008	1,0042%	526,422	750,560	-	750,560	526,422	224,138	-	84,693,223
Oct-21	84,693,223	32,408,838	52,284,386	1,0042%	525,040	750,560	-	750,560	525,040	225,520	-	84,467,703
Nov-21	84,467,703	32,321,788	52,145,914	1,0042%	523,649	750,560	-	750,560	523,649	226,911	-	84,240,791
Dec-21	84,240,791	32,234,203	52,006,588	1,0042%	522,250	750,560	-	750,560	522,250	228,310	-	84,012,481
Jan-22	84,012,481	32,146,077	51,866,404	1,0042%	520,842	750,560	-	750,560	520,842	229,718	-	83,782,762
Feb-22	83,782,762	32,057,407	51,725,355	1,0042%	519,426	750,560	-	750,560	519,426	231,134	-	83,551,628
Mar-22	83,551,628	31,968,191	51,583,437	1,0042%	518,001	750,560	-	750,560	518,001	232,559	-	83,319,068
Apr-22	83,319,068	31,878,424	51,440,644	1,0042%	516,567	750,560	-	750,560	516,567	233,993	-	83,085,075
May-22	83,085,075	31,788,104	51,296,970	1,0042%	515,124	750,560	-	750,560	515,124	235,436	-	82,849,638
Jun-22	82,849,638	31,697,227	51,152,411	1,0042%	513,673	750,560	-	750,560	513,673	236,887	-	82,612,751
Jul-22	82,612,751	31,606,790	51,006,961	1,0042%	512,212	750,560	-	750,560	512,212	238,348	-	82,374,402
Aug-22	82,374,402	31,513,789	50,860,614	1,0042%	510,742	750,560	-	750,560	510,742	239,818	-	82,134,584
Sep-22	82,134,584	31,421,220	50,713,364	1,0042%	509,264	750,560	-	750,560	509,264	241,296	-	81,893,287
Oct-22	81,893,287	31,328,080	50,565,207	1,0042%	507,776	750,560	-	750,560	507,776	242,784	-	81,650,503
Nov-22	81,650,503	31,234,367	50,416,136	1,0042%	506,279	750,560	-	750,560	506,279	244,281	-	81,406,221
Dec-22	81,406,221	31,140,075	50,266,146	1,0042%	504,773	750,560	-	750,560	504,773	245,787	-	81,160,434
Jan-23	81,160,434	31,045,202	50,115,232	1,0042%	503,257	750,560	-	750,560	503,257	247,303	-	80,913,130
Feb-23	80,913,130	30,949,387	49,963,387	1,0042%	501,732	750,560	-	750,560	501,732	248,828	-	80,664,302
Mar-23	80,664,302	30,853,686	49,810,606	1,0042%	500,198	750,560	-	750,560	500,198	250,362	-	80,413,939
Apr-23	80,413,939	30,757,057	49,656,882	1,0042%	498,654	750,560	-	750,560	498,654	251,906	-	80,162,033
May-23	80,162,033	30,659,822	49,502,211	1,0042%	497,101	750,560	-	750,560	497,101	253,459	-	79,908,673
Jun-23	79,908,673	30,561,966	49,346,587	1,0042%	495,538	750,560	-	750,560	495,538	255,022	-	79,653,551
Jul-23	79,653,551	30,463,548	49,190,003	1,0042%	493,966	750,560	-	750,560	493,966	256,594	-	79,396,956
Aug-23	79,396,956	30,364,503	49,032,453	1,0042%	492,384	750,560	-	750,560	492,384	258,176	-	79,138,780

Sep-23	79,138,780	30,264,847	48,873,933	1.0042%	490,792	750,560	-	750,560	490,792	259,768	-	
Oct-23	78,879,011	30,164,576	48,714,435	1.0042%	489,190	750,560	-	750,560	489,190	261,370	-	78,879,011
Nov-23	78,617,641	30,083,687	48,553,954	1.0042%	487,579	750,560	-	750,560	487,579	262,981	-	78,617,641
Dec-23	78,354,659	29,962,176	48,392,484	1.0042%	485,967	750,560	-	750,560	485,967	264,603	-	78,354,659
Jan-24	78,090,056	29,860,038	48,230,017	1.0042%	484,326	750,560	-	750,560	484,326	266,234	-	78,090,056
Feb-24	77,823,821	29,757,271	48,066,550	1.0042%	482,684	750,560	-	750,560	482,684	267,876	-	77,823,821
Mar-24	77,555,945	29,653,870	47,902,074	1.0042%	481,033	750,560	-	750,560	481,033	269,527	-	77,555,945
Apr-24	77,286,417	29,549,832	47,736,585	1.0042%	479,371	750,560	-	750,560	479,371	271,189	-	77,286,417
May-24	77,015,228	29,445,152	47,570,076	1.0042%	477,689	750,560	-	750,560	477,689	272,861	-	77,015,228
Jun-24	76,742,366	29,339,827	47,402,540	1.0042%	476,016	750,560	-	750,560	476,016	274,544	-	76,742,366
Jul-24	76,467,822	29,233,851	47,233,970	1.0042%	474,324	750,560	-	750,560	474,324	276,236	-	76,467,822
Aug-24	76,191,585	29,127,223	47,064,362	1.0042%	472,620	750,560	-	750,560	472,620	277,940	-	76,191,585
Sep-24	75,913,645	29,019,936	46,893,708	1.0042%	470,907	750,560	-	750,560	470,907	279,653	-	75,913,645
Oct-24	75,633,991	28,911,988	46,722,003	1.0042%	469,182	750,560	-	750,560	469,182	281,378	-	75,633,991
Nov-24	75,352,613	28,803,375	46,549,238	1.0042%	467,447	750,560	-	750,560	467,447	283,113	-	75,352,613
Dec-24	75,069,489	28,694,091	46,375,408	1.0042%	465,702	750,560	-	750,560	465,702	284,858	-	75,069,489
Jan-25	74,784,641	28,584,134	46,200,507	1.0042%	463,945	750,560	-	750,560	463,945	286,615	-	74,784,641
Feb-25	74,498,025	28,473,499	46,024,527	1.0042%	462,178	750,560	-	750,560	462,178	288,382	-	74,498,025
Mar-25	74,209,643	28,362,181	45,847,462	1.0042%	460,400	750,560	-	750,560	460,400	290,160	-	74,209,643
Apr-25	73,919,482	28,250,177	45,669,306	1.0042%	458,611	750,560	-	750,560	458,611	291,949	-	73,919,482
May-25	73,627,533	28,137,482	45,490,051	1.0042%	456,811	750,560	-	750,560	456,811	293,749	-	73,627,533
Jun-25	73,333,783	28,024,092	45,309,692	1.0042%	455,000	750,560	-	750,560	455,000	295,560	-	73,333,783
Jul-25	73,038,223	27,910,002	45,128,220	1.0042%	453,178	750,560	-	750,560	453,178	297,382	-	73,038,223
Aug-25	72,740,840	27,795,210	44,945,630	1.0042%	451,344	750,560	-	750,560	451,344	299,216	-	72,740,840
Sep-25	72,441,624	27,679,709	44,761,914	1.0042%	449,489	750,560	-	750,560	449,489	301,061	-	72,441,624
Oct-25	72,140,562	27,563,497	44,577,065	1.0042%	447,673	750,560	-	750,560	447,673	302,917	-	72,140,562
Nov-25	71,837,645	27,446,567	44,391,078	1.0042%	445,775	750,560	-	750,560	445,775	304,785	-	71,837,645
Dec-25	71,532,859	27,328,917	44,203,943	1.0042%	443,886	750,560	-	750,560	443,886	306,664	-	71,532,859
Jan-26	71,226,185	27,210,540	44,015,654	1.0042%	442,005	750,560	-	750,560	442,005	308,555	-	71,226,185
Feb-26	70,917,639	27,091,434	43,826,205	1.0042%	440,103	750,560	-	750,560	440,103	310,457	-	70,917,639
Mar-26	70,607,182	26,971,594	43,635,588	1.0042%	438,189	750,560	-	750,560	438,189	312,371	-	70,607,182
Apr-26	70,294,610	26,851,014	43,443,796	1.0042%	436,263	750,560	-	750,560	436,263	314,297	-	70,294,610
May-26	69,980,513	26,729,691	43,250,822	1.0042%	434,325	750,560	-	750,560	434,325	316,235	-	69,980,513
Jun-26	69,664,277	26,607,620	43,056,658	1.0042%	432,375	750,560	-	750,560	432,375	318,185	-	69,664,277
Jul-26	69,346,092	26,484,795	42,861,297	1.0042%	430,413	750,560	-	750,560	430,413	320,147	-	69,346,092
Aug-26	69,025,944	26,361,213	42,664,731	1.0042%	428,439	750,560	-	750,560	428,439	322,121	-	69,025,944
Sep-26	68,703,823	26,236,869	42,466,953	1.0042%	426,453	750,560	-	750,560	426,453	324,107	-	68,703,823
Oct-26	68,379,715	26,111,759	42,267,956	1.0042%	424,455	750,560	-	750,560	424,455	326,105	-	68,379,715
Nov-26	68,053,610	25,985,877	42,067,733	1.0042%	422,444	750,560	-	750,560	422,444	328,116	-	68,053,610
Dec-26	67,725,493	25,859,218	41,866,275	1.0042%	420,421	750,560	-	750,560	420,421	330,139	-	67,725,493
Jan-27	67,395,354	25,731,778	41,663,575	1.0042%	418,386	750,560	-	750,560	418,386	332,174	-	67,395,354
Feb-27	67,063,179	25,603,553	41,459,627	1.0042%	416,338	750,560	-	750,560	416,338	334,222	-	67,063,179
Mar-27	66,728,957	25,474,537	41,254,420	1.0042%	414,277	750,560	-	750,560	414,277	336,283	-	66,728,957
Apr-27	66,392,673	25,344,725	41,047,948	1.0042%	412,203	750,560	-	750,560	412,203	338,357	-	66,392,673
May-27	66,054,316	25,214,113	40,840,203	1.0042%	410,117	750,560	-	750,560	410,117	340,443	-	66,054,316
Jun-27	65,713,872	25,082,695	40,631,177	1.0042%	408,018	750,560	-	750,560	408,018	342,542	-	65,713,872
Jul-27	65,371,330	24,950,467	40,420,863	1.0042%	405,906	750,560	-	750,560	405,906	344,654	-	65,371,330
Aug-27	65,026,675	24,817,423	40,209,252	1.0042%	403,781	750,560	-	750,560	403,781	346,779	-	65,026,675

Sep-27	64,679,896	24,683,559	39,996,337	1.0042%	401,643	-	750,560	401,643	348,917	-	64,330,978
Oct-27	64,330,978	24,548,869	39,782,109	1.0042%	399,492	-	750,560	399,492	351,068	-	63,979,910
Nov-27	63,979,910	24,413,349	39,566,561	1.0042%	397,327	-	750,560	397,327	353,233	-	63,626,676
Dec-27	63,626,676	24,276,993	39,349,684	1.0042%	395,150	-	750,560	395,150	355,410	-	63,271,266
Jan-28	63,271,266	24,139,796	39,131,470	1.0042%	392,958	-	750,560	392,958	357,602	-	62,913,663
Feb-28	62,913,663	24,001,753	38,911,911	1.0042%	390,753	-	750,560	390,753	359,807	-	62,553,866
Mar-28	62,553,866	23,862,858	38,690,997	1.0042%	388,535	-	750,560	388,535	362,025	-	62,191,830
Apr-28	62,191,830	23,723,108	38,468,723	1.0042%	386,303	-	750,560	386,303	364,257	-	61,827,573
May-28	61,827,573	23,582,495	38,245,078	1.0042%	384,057	-	750,560	384,057	366,503	-	61,461,069
Jun-28	61,461,069	23,441,015	38,020,054	1.0042%	381,797	-	750,560	381,797	368,763	-	61,092,306
Jul-28	61,092,306	23,298,663	37,793,643	1.0042%	379,524	-	750,560	379,524	371,036	-	60,721,269
Aug-28	60,721,269	23,155,433	37,565,836	1.0042%	377,236	-	750,560	377,236	373,324	-	60,347,945
Sep-28	60,347,945	23,011,320	37,336,625	1.0042%	374,934	-	750,560	374,934	375,626	-	59,972,318
Oct-28	59,972,318	22,866,318	37,106,001	1.0042%	372,618	-	750,560	372,618	377,942	-	59,594,376
Nov-28	59,594,376	22,720,421	36,873,965	1.0042%	370,288	-	750,560	370,288	380,272	-	59,214,103
Dec-28	59,214,103	22,573,625	36,640,478	1.0042%	367,944	-	750,560	367,944	382,616	-	58,831,487
Jan-29	58,831,487	22,425,924	36,405,563	1.0042%	365,585	-	750,560	365,585	384,975	-	58,446,511
Feb-29	58,446,511	22,277,312	36,169,199	1.0042%	363,211	-	750,560	363,211	387,349	-	58,059,162
Mar-29	58,059,162	22,127,783	35,931,379	1.0042%	360,823	-	750,560	360,823	389,737	-	57,669,424
Apr-29	57,669,424	21,977,332	35,692,092	1.0042%	358,420	-	750,560	358,420	392,140	-	57,277,284
May-29	57,277,284	21,825,964	35,451,330	1.0042%	356,002	-	750,560	356,002	394,558	-	56,882,725
Jun-29	56,882,725	21,673,642	35,209,083	1.0042%	353,570	-	750,560	353,570	396,990	-	56,485,735
Jul-29	56,485,735	21,520,391	34,965,344	1.0042%	351,122	-	750,560	351,122	399,438	-	56,086,296
Aug-29	56,086,296	21,366,194	34,720,102	1.0042%	348,659	-	750,560	348,659	401,901	-	55,684,395
Sep-29	55,684,395	21,211,047	34,473,348	1.0042%	346,181	-	750,560	346,181	404,379	-	55,280,015
Oct-29	55,280,015	21,054,942	34,225,073	1.0042%	343,688	-	750,560	343,688	406,872	-	54,873,143
Nov-29	54,873,143	20,897,875	33,975,268	1.0042%	341,180	-	750,560	341,180	409,380	-	54,463,762
Dec-29	54,463,762	20,739,840	33,723,922	1.0042%	338,656	-	750,560	338,656	411,904	-	54,051,858
Jan-30	54,051,858	20,580,830	33,471,028	1.0042%	336,116	-	750,560	336,116	414,444	-	53,637,413
Feb-30	53,637,413	20,420,839	33,216,574	1.0042%	333,561	-	750,560	333,561	416,999	-	53,220,414
Mar-30	53,220,414	20,259,862	32,960,552	1.0042%	330,980	-	750,560	330,980	419,570	-	52,800,843
Apr-30	52,800,843	20,097,892	32,702,951	1.0042%	328,403	-	750,560	328,403	422,157	-	52,378,686
May-30	52,378,686	19,934,923	32,443,762	1.0042%	325,800	-	750,560	325,800	424,760	-	51,953,925
Jun-30	51,953,925	19,770,950	32,182,976	1.0042%	323,181	-	750,560	323,181	427,379	-	51,526,546
Jul-30	51,526,546	19,605,965	31,920,981	1.0042%	320,546	-	750,560	320,546	430,014	-	51,096,531
Aug-30	51,096,531	19,439,962	31,656,569	1.0042%	317,895	-	750,560	317,895	432,665	-	50,663,866
Sep-30	50,663,866	19,272,936	31,390,930	1.0042%	315,228	-	750,560	315,228	435,332	-	50,228,533
Oct-30	50,228,533	19,104,880	31,123,654	1.0042%	312,544	-	750,560	312,544	438,016	-	49,790,517
Nov-30	49,790,517	18,935,787	30,854,730	1.0042%	309,843	-	750,560	309,843	440,717	-	49,349,799
Dec-30	49,349,799	18,765,652	30,584,147	1.0042%	307,126	-	750,560	307,126	443,434	-	48,906,365
Jan-31	48,906,365	18,594,467	30,311,898	1.0042%	304,392	-	750,560	304,392	446,168	-	48,460,196
Feb-31	48,460,196	18,422,227	30,037,969	1.0042%	301,641	-	750,560	301,641	448,919	-	48,011,277
Mar-31	48,011,277	18,248,925	29,762,352	1.0042%	298,874	-	750,560	298,874	451,686	-	47,559,590
Apr-31	47,559,590	18,074,553	29,485,037	1.0042%	296,089	-	750,560	296,089	454,471	-	47,105,119
May-31	47,105,119	17,899,107	29,206,012	1.0042%	293,287	-	750,560	293,287	457,273	-	46,647,845
Jun-31	46,647,845	17,722,579	28,925,287	1.0042%	290,468	-	750,560	290,468	460,092	-	46,187,753
Jul-31	46,187,753	17,544,962	28,642,791	1.0042%	287,631	-	750,560	287,631	462,929	-	45,724,823
Aug-31	45,724,823	17,366,250	28,358,574	1.0042%	284,777	-	750,560	284,777	465,783	-	45,259,040

Sep-31	45,259,040	17,186,435	28,072,605	1.0042%	281,905	750,560	-	750,560	281,905	488,655	-	44,790,384
Oct-31	44,790,384	17,005,512	27,784,873	1.0042%	279,108	750,560	-	750,560	279,016	471,544	-	44,318,940
Nov-31	44,318,940	16,823,473	27,495,467	1.0042%	276,108	750,560	-	750,560	276,108	474,452	-	43,844,387
Dec-31	43,844,387	16,640,311	27,204,076	1.0042%	273,183	750,560	-	750,560	273,183	477,377	-	43,367,010
Jan-32	43,367,010	16,456,020	26,910,990	1.0042%	270,240	750,560	-	750,560	270,240	480,320	-	42,886,689
Feb-32	42,886,689	16,270,592	26,616,097	1.0042%	267,279	750,560	-	750,560	267,279	483,281	-	42,403,408
Mar-32	42,403,408	16,084,021	26,319,386	1.0042%	264,289	750,560	-	750,560	264,299	486,261	-	41,917,146
Apr-32	41,917,146	15,896,300	26,020,847	1.0042%	261,301	750,560	-	750,560	261,301	489,269	-	41,427,887
May-32	41,427,887	15,707,420	25,720,467	1.0042%	258,285	750,560	-	750,560	258,285	492,275	-	40,935,611
Jun-32	40,935,611	15,517,376	25,418,236	1.0042%	255,250	750,560	-	750,560	255,250	495,310	-	40,440,301
Jul-32	40,440,301	15,326,160	25,114,141	1.0042%	252,196	750,560	-	750,560	252,196	498,364	-	39,941,936
Aug-32	39,941,936	15,133,764	24,808,172	1.0042%	249,124	750,560	-	750,560	249,124	501,436	-	39,440,500
Sep-32	39,440,500	14,940,182	24,500,318	1.0042%	246,032	750,560	-	750,560	246,032	504,528	-	38,940,500
Oct-32	38,935,971	14,745,407	24,190,565	1.0042%	242,922	750,560	-	750,560	242,922	507,638	-	38,428,333
Nov-32	38,428,333	14,549,430	23,878,903	1.0042%	239,792	750,560	-	750,560	239,792	510,768	-	37,917,564
Dec-32	37,917,564	14,352,245	23,565,320	1.0042%	236,643	750,560	-	750,560	236,643	513,917	-	37,403,647
Jan-33	37,403,647	14,153,843	23,249,804	1.0042%	233,475	750,560	-	750,560	233,475	517,085	-	36,886,561
Feb-33	36,886,561	13,954,218	22,932,343	1.0042%	230,287	750,560	-	750,560	230,287	520,273	-	36,366,288
Mar-33	36,366,288	13,753,362	22,612,926	1.0042%	227,079	750,560	-	750,560	227,079	523,481	-	35,842,806
Apr-33	35,842,806	13,551,268	22,291,538	1.0042%	223,852	750,560	-	750,560	223,852	526,708	-	35,316,098
May-33	35,316,098	13,347,927	21,968,171	1.0042%	220,604	750,560	-	750,560	220,604	529,956	-	34,786,141
Jun-33	34,786,141	13,143,332	21,642,809	1.0042%	217,337	750,560	-	750,560	217,337	533,223	-	34,252,918
Jul-33	34,252,918	12,937,476	21,315,442	1.0042%	214,050	750,560	-	750,560	214,050	536,510	-	33,716,407
Aug-33	33,716,407	12,730,350	20,986,057	1.0042%	210,742	750,560	-	750,560	210,742	539,818	-	33,176,589
Sep-33	33,176,589	12,521,946	20,654,642	1.0042%	207,414	750,560	-	750,560	207,414	543,146	-	32,633,442
Oct-33	32,633,442	12,312,258	20,321,185	1.0042%	204,065	750,560	-	750,560	204,065	546,495	-	32,086,947
Nov-33	32,086,947	12,101,276	19,985,671	1.0042%	200,686	750,560	-	750,560	200,686	549,884	-	31,537,082
Dec-33	31,537,082	11,888,993	19,648,089	1.0042%	197,306	750,560	-	750,560	197,306	553,254	-	30,983,828
Jan-34	30,983,828	11,675,401	19,308,427	1.0042%	193,895	750,560	-	750,560	193,895	556,665	-	30,427,162
Feb-34	30,427,162	11,460,493	18,966,670	1.0042%	190,463	750,560	-	750,560	190,463	560,097	-	29,867,065
Mar-34	29,867,065	11,244,258	18,622,807	1.0042%	187,010	750,560	-	750,560	187,010	563,550	-	29,303,514
Apr-34	29,303,514	11,026,690	18,276,824	1.0042%	183,536	750,560	-	750,560	183,536	567,024	-	28,736,480
May-34	28,736,480	10,807,781	17,928,709	1.0042%	180,040	750,560	-	750,560	180,040	570,520	-	28,165,969
Jun-34	28,165,969	10,587,521	17,578,448	1.0042%	176,523	750,560	-	750,560	176,523	574,037	-	27,591,932
Jul-34	27,591,932	10,365,903	17,226,029	1.0042%	172,984	750,560	-	750,560	172,984	577,576	-	27,014,355
Aug-34	27,014,355	10,142,919	16,871,437	1.0042%	169,423	750,560	-	750,560	169,423	581,137	-	26,433,218
Sep-34	26,433,218	9,918,559	16,514,659	1.0042%	165,840	750,560	-	750,560	165,840	584,720	-	25,848,497
Oct-34	25,848,497	9,692,816	16,155,682	1.0042%	162,235	750,560	-	750,560	162,235	588,325	-	25,260,172
Nov-34	25,260,172	9,465,680	15,794,492	1.0042%	158,608	750,560	-	750,560	158,608	591,952	-	24,668,219
Dec-34	24,668,219	9,237,144	15,431,075	1.0042%	154,989	750,560	-	750,560	154,989	595,601	-	24,072,618
Jan-35	24,072,618	9,007,199	15,065,419	1.0042%	151,287	750,560	-	750,560	151,287	599,273	-	23,473,344
Feb-35	23,473,344	8,775,835	14,697,509	1.0042%	147,582	750,560	-	750,560	147,582	602,968	-	22,870,376
Mar-35	22,870,376	8,543,045	14,327,331	1.0042%	143,875	750,560	-	750,560	143,875	606,685	-	22,263,690
Apr-35	22,263,690	8,308,819	13,954,871	1.0042%	140,135	750,560	-	750,560	140,135	610,425	-	21,653,265
May-35	21,653,265	8,073,149	13,580,116	1.0042%	136,372	750,560	-	750,560	136,372	614,188	-	21,039,076
Jun-35	21,039,076	7,836,025	13,203,051	1.0042%	132,585	750,560	-	750,560	132,585	617,975	-	20,421,101
Jul-35	20,421,101	7,597,439	12,823,662	1.0042%	128,775	750,560	-	750,560	128,775	621,785	-	19,799,315
Aug-35	19,799,315	7,357,382	12,441,933	1.0042%	124,942	750,560	-	750,560	124,942	625,618	-	19,173,697

ATTACHMENT 6: COMPARISON OF SOURCE DATA

Date	Amount Per Dana Direct, Attachment 2	Amount Per Cal Am G/L Provided in Response to RK2-006	Amount Per Schubert Direct, Attachment 11 (approximate)
Jan-00			2,573,956
Sep-10			36,911
Oct-10			67,655
Nov-10			67,131
Dec-10			66,425
Jan-11			36,448
Feb-11			15,392
Mar-11			31,273
Apr-11			35,769
May-11			58,061
Jun-11			231,933
Jul-11			113,541
Aug-11			303,499
Sep-11			415,392
Oct-11			162,921
Nov-11			264,460
Dec-11			309,168
Jan-12			198,315
Feb-12			174,945
Mar-12			189,633
Apr-12			311,914
May-12			306,266
Jun-12			126,042
Jul-12	(554,637)		349,089
Aug-12	51,014		210,702
Sep-12	969,337		146,256
Oct-12	805,587.02		314,585
Nov-12	107,914.34		95,394
Dec-12	(122,194.29)		121,243
Jan-13	(301,386.76)		89,932
Feb-13	98,333.28		143,370
Mar-13	420,951.91		68,896
Apr-13	156,224.67		134,415
May-13	246,911.53	32,419,713	129,609
Jun-13	1,771,947.48	1,679,692	160,663
Jul-13	595,102.60	244,437	1,846,373
Aug-13	2,807,260.07	2,734,910	2,242,013
Sep-13	1,769,304.58	1,737,263	1,898,977
Oct-13	5,321,118.30	5,462,962	4,008,788
Nov-13	939,355.14	1,277,188	819,221
Dec-13	(1,368,045.80)	(515,959)	253,739
Jan-14	425,935.14	115,579	442,005
Feb-14	454,453.55	230,489	370,370
Mar-14	446,931.02	400,576	669,667
Apr-14	1,415,102.68	1,375,220	1,100,800
May-14	899,842.32	726,202	1,720,310

[illegible]